

2020 – 2024

CONSOLIDATED PLAN

STATE OF NEBRASKA CONSOLIDATED PLAN FOR
HOUSING AND COMMUNITY DEVELOPMENT



July 1, 2020 - June 30, 2025

NEBRASKA

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DEPT. OF ECONOMIC DEVELOPMENT

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Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

Introduction

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes to the Community Development Block Grants (CDBG), Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), HOME Investment Partnership (HOME) and the National Housing Trust Fund (HTF). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities. It was termed the Consolidated Plan for Housing and Community Development.

According to HUD, the Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers entitlement communities the opportunity to shape these housing and community development programs into effective, coordinated neighborhood and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort.

As the lead agency for the Consolidated Plan, the Nebraska Department of Economic Development hereby follows HUD's guidelines for citizen and community involvement. Furthermore, it is responsible for overseeing citizen participation requirements that accompany the Consolidated Plan.

The State of Nebraska has prepared this Consolidated Plan to meet the guidelines as set forth by HUD and is broken into five sections: The Process, Needs Assessment, Market Analysis, Strategic Plan, and Annual Action Plan.

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The goals of the federal programs are to provide decent housing, a suitable living environment for the Area's low- and moderate-income residents, and economic opportunities for low-moderate income residents. The State strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities. These goals are further explained as follows:

- Providing decent housing means helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.
- Providing a suitable living environment entails improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
- Expanding economic opportunities involves creating jobs that are accessible to low- and moderate-income persons; making down payment and closing cost assistance available for

low- and moderate-income persons; promoting long term economic and social viability; and empowering low-income persons to achieve self-sufficiency.

Evaluation of past performance

Nebraska's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). These documents state the objectives and outcomes identified in each year's Annual Action Plan and include an evaluation of past performance through measurable goals and objectives compared to actual performance. These documents can be found on the Department of Economic Development's website at:

<https://opportunity.nebraska.gov/grow-your-community/reports-plans/>

Summary of citizen participation process and consultation process

A variety of public outreach and citizen participation was used to develop this Consolidated Plan. Nebraska issued a Housing and Community Development survey in English and Spanish in November 2019 and the survey closed on April 21, 2020. This survey helped establish priorities throughout the State by gathering feedback on the level of need for housing and community development categories. A series of public input meetings were held prior to the release of the draft plan to garner feedback on preliminary findings. These meetings were held in-person and through webinars. Meetings occurred January 30, 2020, February 6, 2020, and February 13, 2020. Transcripts from the public input meetings are included in Appendix 1.4. The Plan was released for public review on March 20, 2020 electronically and paper copies were made available to the following libraries. The libraries included: Alliance Public Library (Alliance), Auburn Memorial Library (Auburn), Garfield County (Burwell), Central City Public Library (Central City), Chadron Public Library (Chadron), Lexington Public Library (Lexington), Bennett Martin Public Library (Lincoln), McCook Public Library (McCook), Jensen Memorial Library (Minden), Goodall City Library (Ogallala), W. Dale Clark Library (Omaha), Scottsbluff Public Library (Scottsbluff), Sidney Public Library (Sidney), Wayne Public Library (Wayne), Thomas County Library (Thedford), and Valentine Public Library (Valentine).

Due to COVID-19 many of these libraries were closed. When feasible, libraries made these documents available digitally through social media or their websites. The public could also request a paper copy to be mailed directly to their residence. The 30-day public comment period occurred from March 23 to April 21, 2020. A public hearing occurred on April 14, 2020 via webinar in the morning and afternoon. Transcripts from the public hearing presentation are included in Appendix 1.4.

Summary of public comments

The following summary of public comments were received during the public comment period. The public comments were received and reviewed in-depth.

1. Owner Occupied Rehabilitation is one of the greatest ongoing needs in smaller rural communities that helps preserve our housing stock. It was also a need in the DED survey that was sent out for the Consolidated Plan. The CDBG OOR programs have been a huge impact in providing assistance to preserve the housing stock in the communities SWNCBC serves. One of the barriers for small rural communities in applying for CDBG OOR applications is the current minimum assistance for CDBG grant applications is too high. I would like to see the minimum grant application amount

reduced to \$150,000. As the CDBG Administrator for the communities SWNCBC serves, I would like to see NDED allow Regional CDBG applications. The communities that SWNCBC serves are small rural communities and are not able to apply for large CDBG OOR projects as 80% of the communities we serve have populations of 900 and less. However, regional CDBG OOR applications would allow bigger projects that can serve more LMI homeowners for smaller rural communities.

Response: Thank you for your comment. The Department took your comment into consideration. The minimum \$250,000 project cost threshold for CDBG Owner Occupied Rehabilitation applications will remain. There are a variety of funding programs that allow for smaller owner-occupied housing rehabilitation programs. For example, the Nebraska Affordable Housing Trust Fund (NAHTF) program, overseen by the Nebraska Department of Economic Development, does not have a minimum grant threshold.

2. Currently, all of the HOME funds are tied to tax credits. This is not ideal for smaller communities to apply for these funds as they are for larger multi-family projects. Smaller communities still have a need for rentals, preferable single-family rental units as was indicated in the Consolidated Plan survey results, as smaller 4-6 unit projects are more ideal to meet their community needs. I would like to see some of the HOME funds used for single-family housing needs such as single-family rental, single-family new construction, DPA and OOR as these were need shown in the DED surveys for the Consolidated Plan.

Response: Thank you for your comment. The Department took your comment into consideration. Not all of the HOME fund allocation is tied to NIFA/DED low-income housing tax credit program. The Department's HOME fund allocation will remain to be available to eligible CHDOs through the CHDO Operating Program and the CHDO Program. The Department encourages new CHDOs. In addition, the Department's HOME fund allocation will also be available through the joint NIFA/DED application cycle. There are a variety of funding programs that allow for single-family rental, single-family new construction, down payment assistance and owner-occupied rehabilitation programs. For example, the Nebraska Affordable Housing Trust Fund (NAHTF) program, overseen by the Nebraska Department of Economic Development.

3. Correction required on page 10 regarding "Describe consultation with the CoCs ... procedures for the administration of HMIS." The following language is incorrect, "NHAP will continue to utilize ESG and HSATF to provide funding for the HMIS system as administered by Center for Children Families and the Law (CCFL). The BoS CoC has selected CCFL as the HMIS administrator and the Lincoln CoCs and the City of Omaha has selected Institute for Community Alliances (ICA) as the HMIS administrator. CCFL subcontracts with ICA for NHAP related HMIS data for Omaha."

This should read: "NHAP will continue to utilize ESG and HSATF to provide funding for the HMIS system as administered by the University of Nebraska - Lincoln - Center on Children, Families, and the Law (UNL-CCFL). The Nebraska BoS CoC and the City of Lincoln CoC have selected CCFL as the HMIS Lead. The Omaha CoC (MAACH) has selected Institute for Community Alliances (ICA) as the HMIS Lead. A single contract is provided by NHAP for HMIS system support to UNL-CCFL which subcontracts to ICA for the Omaha HMIS."

Response: DHHS appreciates the comment and will adopt the corrected language.

4. Youth Emergency Services (YES) provides critically needed resources to empower youth and young adults experiencing homelessness and near homelessness to become self-sufficient in Douglas and Sarpy Counties. Youth Emergency Services provides services to over 3,000 youth per year through the continuum of services focused on prevention and self-sufficiency. YES' goal is to end youth homelessness and if it does occur, it is brief, rare and doesn't reoccur for that particular youth. YES' research based continuum meets youth, ages 12-22 where they are. Many youth are introduced to YES through the Street Outreach Program and Center. YES operates an emergency shelter for youth ages 16-20. The Transitional Housing Program and Maternity Group Home provide 19 units for young people ages 16-22. Youth who experience homelessness are often victims of human and labor trafficking so YES provides specific services for these youth. YES also has a Rapid Rehousing program and funding to help youth stay in their own apartments through rent assistance and supportive services.

Youth Emergency Services is active in the Metro Area Continuum of Care for the Homeless, with representation on the Board of Directors and participation in Coordinated Entry for youth and serving on many committees. YES co-chairs the Youth and Young Adult Systems Improvement Team committees to ensure the system addresses the needs of youth and young adults.

It is important to ensure the Nebraska Housing Assistance Program addresses the needs of young adults who need housing and address prevention services to prevent young adults from becoming chronically homeless adults. The Community Survey rated "Youth Services" and "Homeless Services" as High. At risk youth and youth aging out of foster care are identified as high needs areas of focus for this Consolidated Plan. One of the Outcomes of the Consolidated Plan is for homelessness to be rare, brief and non-recurring. The work YES does will help Nebraska meet this outcome.

YES recently secured financial support through the Nebraska Housing Assistance Program for prevention services. With a small investment, YES serves many young people annually to prevent further entry into homelessness.

Funding from Nebraska Housing Assistance Program provides rent assistance including funding for a deposit, back rent, utilities, application fees, and rent assistance for up to three months. This funding helps resolve an immediate issue preventing success in achieving stable housing and reduces trauma and the negative impact of an eviction on a youth's record. This is a cost-effective intervention and it should be a significant component of the Consolidated Plan.

The National Law Center on Homelessness and Poverty of True Colors recently released the "State Index on Youth Homelessness". Nebraska rated 48th. Nebraska can do better with attention to services and housing to youth and young adults to empower them to be self-sufficient, tax paying members of society.

These services are critical to prevent young people from experiencing chronic homelessness. We must address youth homelessness so we can continue the great work Nebraska has been doing in reducing adult homelessness. I urge you to provide financial support to agencies serving youth and young adults across our state and consider the needs of young adults in planning for the future.

Response: DHHS appreciates the commenter's concerns and efforts in this area. As noted, the Housing and Community Development Survey found that At-Risk Youth aging out of the foster system, persons with severe mental illness, and at-risk youth had the highest rated needs for housing and supportive service needs. DHHS supports efforts to provide housing and supportive services to at-risk youth and youth aging out of the foster care system. The Balance of the State Continuum of Care received Youth Homeless Demonstration Project funds, and DHHS supports the Lincoln Continuum of Care and the Metro Area Continuum of Care for the Homeless work towards applying for future YHDP grants.

Summary of comments or views not accepted and the reasons for not accepting them

Not applicable.

Summary

The Needs Assessment and Market Analysis, which has been guided by the Housing and Community Development Survey and public input, identified six (6) priority needs. These are described below:

- **Households with unmet housing needs:** The State's Housing Priority Need includes the need to respond to regional needs for affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska.
- **Special Needs and LMI Populations:** There are a number of special needs populations in Nebraska that are in need of services. These include, but are not limited to, the elderly, persons with disabilities, persons and persons with HIV/AIDS. This also includes LMI households and the need for employment training opportunities in the State.
- **Homelessness:** The Homelessness Priority Need is intended to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at risk of becoming homeless by distributing Emergency Solutions Grant Program funds and Homeless Shelter Assistance Trust Funds.
- **Economic Development Priority Needs:** The Economic Development Priority need is intended to foster the competitiveness of Nebraska's business and industrial sector, and as a result, assist in economic development of Nebraska's communities and people.
- **Community Development Priority Needs:** The Community Development Program is intended to strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development.
- **Persons with HIV/AIDS:** The Persons with HIV/AIDS Priority Need is intended to ensure appropriate emergency and/or permanent housing and services for people who are homeless or at imminent risk of becoming homeless by distributing funding to a project sponsor in order to meet the needs of persons living with HIV/AIDS.

These Priority Needs are addressed with the following Goals:

Increase Availability of Affordable Housing

Within the Nebraska affordable housing programs resources will be provided that primarily benefit low to moderate income persons, and extremely low income persons, through affordable housing activities. These activities are completed through resources from CDBG, HOME, HTF, and NAHTF.

Enhance Public Facilities and Infrastructure

Through CDBG funding, this priority need includes activities related to planning; public works; water/wastewater; emergent threat; and downtown revitalization. A wide variety of activities are funded that primarily serve LMI persons throughout the state.

Encourage Economic Development

The primary goals of the Program include: job creation and expansion; and tourism development. A wide variety of activities are funded that primarily serve LMI persons throughout the state.

Support Vital Public Services

The primary goals of the Program include: funding public services including youth employment training opportunities that will primarily benefit LMI persons throughout the state.

Reduce Homelessness

Provide Rapid Rehousing so persons who are homeless can secure permanent housing options which address their needs and encourage stability.

Provide immediate emergency shelter to people who are homeless as a temporary measure until suitable permanent housing can be secured. Emergency shelter participants may include those individuals fleeing domestic violence/sexual assault/stalking/trafficking and may serve as a temporary refuge until individuals can return to their residence safely with supports in place.

Assure needed services are provided to people who are at risk of becoming homeless to prevent entry into emergency shelter or other temporary housing.

The goal outcome indicators include ESG for Balance of State (BoS) Continuum of Care (CoC) and Nebraska Homeless Shelter Assistance Trust Fund (HSATF) for all 6 regions in Nebraska, excluding Lincoln.

Assist Persons with HIV/AIDS

The primary goals of the Program help to provide activities that serve persons with HIV/AIDS throughout Nebraska.

These include homeless prevention, public services, and TBRA activities.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	NEBRASKA	DED Community Development Division
HOPWA Administrator	NEBRASKA	DHHS Public Health Division
HOME Administrator	NEBRASKA	DED Housing and Field Operations Division
ESG Administrator	NEBRASKA	DHHS Children & Family Services Division
HTF Administrator	NEBRASKA	DED Housing and Field Operations Division

Table 1 – Responsible Agencies

Narrative

The Consolidated Plan was developed in partnership between the Nebraska Department of Economic Development (DED) and the Nebraska Department of Health and Human Services (DHHS). The CDBG, HOME, and HTF Programs are administered by DED within the Community Development Division and the Housing and Field Operations Division. The ESG Program is administered by DHHS within the Division of Children and Family Services. The HOPWA Program is administered by DHHS within the Division of Public Health.

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

Introduction

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The State worked at enhancing coordination between housing and service providers throughout the state. This was completed through consultation efforts made by DED and DHHS throughout the development of the Consolidated Plan. Some efforts for coordination included meeting with housing providers that included for-profit developers, members of the regional Development Districts; nonprofit organizations; and community members throughout the state. In addition, consultation with the behavioral health and mental health advisory committee was conducted. DED and DHHS routinely attend the regularly scheduled meetings of this organization in order to obtain a better understanding of what some of the issues and needs are of the mental health and substance abuse service providers.

The Nebraska Commission on Housing and Homelessness (NCHH) was created in 1998 and serves to promote public and private coordination and collaboration, develop policies and program recommendations that address affordable housing and homelessness and at risk of homeless issues, perform as the advisory body to programs overseen by DED and DHHS. The NCHH, in coordination with DED and DHHS, collaborates with a statewide Continuum of Care (CoC) system to evaluate unmet needs, and provide effective solutions to build the services and affordable housing needed for healthy viable Nebraskan communities.

Membership for the advisory body is comprised of governor-appointed representatives from public and assisted housing providers, local, regional and state officials, housing and homeless providers, community leaders, and other interested service agencies. CDBG, HOME, ESG, HTF, and HOPWA program staff are actively engaged in NCHH meetings. Other associations, public and private agencies and business in the state related to low income populations and services, housing, and development are also invited to attend and report at NCHH meetings. NCHH meets quarterly to discuss, plan, and make recommendations for coordination and cooperation of housing across the State of Nebraska, including services and support needed to serve homeless persons and persons at risk of homelessness.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The main objective of the Nebraska Homeless Assistance Program (NHAP) program is to provide an overall Continuum of Care (CoC) approach to address the needs of people who are homeless or are at risk of homelessness. NHAP includes funding from both ESG and the State's Homeless Shelter Assistance Trust Fund (HSATF). Nebraska has two ESG entitlement cities, which are Region 6 Lincoln CoC and the Region 7 Omaha CoC, with the remaining local five regions collectively forming the Balance of State (BoS) CoC, whereas the entire state is referred to as the Continuum of Care System. NHAP is the recipient of ESG funds allocated for the BoS CoC and the State of Nebraska HSATF dollars that are allocated statewide, NHAP coordinates with the entire Continuum of Care System on an ongoing basis by participating in meetings, leading strategic planning efforts, coordinating with ESG entitlement city administrators,

supporting the Homeless Management Information System (HMIS), and participating in the establishment and evaluation of ESG and CoC funding priorities. Being aligned within a division of DHHS enables NHAP to coordinate at a state level with the Division of Behavioral Health, the Division of Children and Family Services Protection and Safety, and the Division of Public Health to address gaps in services.

To effectively help facilitate a cohesive statewide CoC network, a State Continuum of Care Committee has been established which includes representation from governmental, homeless and/or formerly homeless individuals, public, and private entities. All seven local CoC regions have representation on the State CoC Committee. The purpose of the State CoC Committee is to support the objectives of the Nebraska Commission on Housing and Homelessness (NCHH). The NCHH serves as an advisory body to NHAP. To accomplish this, the following objectives are observed:

- 1) Focus attention of the need of persons who are homeless and persons at risk of homelessness;
- 2) Propose solutions to the needs of persons who are homeless and persons at risk of homelessness;
- 3) Encourage and support continuity, coordination, and cooperation at the State level among the State agencies that deliver programs and services to persons who are homeless and persons at risk of homelessness;
- 4) Coordinate the development of a statewide comprehensive plan; and
- 5) Coordinate with the NCHH in developing recommendations for programs and/or services that involve housing persons who are homeless persons at risk of homelessness.

The State CoC Committee is involved in the ongoing planning, coordination and implementation of program and/or services that involve housing and people who are homeless and at risk of homelessness. To accomplish these ongoing effects, quarterly meetings are conducted in person. NHAP attends the meetings to share information and seek input to meet the needs of the populations served by ESG.

Under the guidance and direction of NCHH, the State Continuum of Care Committee is charged with implementing the Opening Doors: 10 Year Plan to Prevent and End Homelessness in Nebraska. The Opening Doors Plan is considered a living document and it will reflect the actual and evolving reality of funding, economics, and society. The State Continuum of Care continues to meet regularly to discuss emerging practices and strengthen collaboration across the state and to work towards ending homelessness in Nebraska.

As previously mentioned, two of the seven regional CoC regions are classified as entitlement regions. The remaining five CoC regions are identified as rural, and in 2010 were collectively grouped as a representative body for regions 1-5, defined as the Balance of State (BoS) CoC. The goal of the BoS CoC is to coordinate the efforts to prevent and end homelessness in rural Nebraska. For the BoS CoC Governing Board membership, each region elects two representatives. The BoS CoC, in conjunction with NHAP, meet monthly via conference call to discuss the planning, coordinating, and prioritization for the supports and services needed to serve and support the homeless and at risk of homelessness population in rural Nebraska. NHAP also participates in the regional CoC meets and the ESG entitlement CoCs to increase collaboration statewide. The BoS CoC is comprised of five distinct local regional CoCs which include: Region 1, Panhandle, (Sioux, Dawes, Sheridan, Box Butte, Scotts Bluff, Morrill, Garden, Banner, Kimball, Cheyenne, Deuel Counties); Region 2, North Central, (Cherry, Keya Paha, Boyd, Brown, Rick, Holt, Blaine, Loup, Garfield, Wheeler, Boone, Platte, Colfax, Custer, Valley, Greeley, Sherman, Howard, Nance, Hall, Merrick, Hamilton Counties); Region 3, Southwest, (Grant, Hooker, Thomas, Arthur, McPherson, Logan, Keith, Lincoln, Perkins, Dawson, Buffalo, Chase, Hayes, Frontier, Gosper, Phelps, Kearney, Dundy, Hitchcock, Red Willow, Furnas, Harlan, Franklin Counties); Region 4, Southeast, (Polk, Butler, Saunders, York, Seward, Lancaster, [The City of Lincoln excluded], Cass, Otoe, Fillmore, Saline, Adams, Clay, Webster,

Nuckolls, Thayer, Jefferson, Gage, Johnson, Nemaha, Pawnee, Richardson Counties); Region 5, Northeast, (Knox, Cedar, Dixon, Dakota, Antelope, Pierce, Wayne, Thurston, Madison, Stanton, Cuming, Burt, Dodge, and Washington, Counties).

Beginning in program year 2019, Douglas and Sarpy counties were included with the City of Omaha (Omaha and Bellevue) in Region 7 for NHAP/HSATF funding due to the close geographical proximity to better align services for homeless and at-risk of homeless persons in a client-focused manner. There have been no changes to Region 6, the City of Lincoln.

At the regional CoC level, in order to ensure that the CoC enables widespread participation and collaboration, the BoS CoC serves as the Governing Board for the five CoC regions in rural Nebraska. Each of the five rural regions hosts monthly regional meetings to coordinate and plan how services and resources can best meet the needs of the homeless and at risk of homelessness within the region. The entitlement cities, Lincoln and Omaha, meet in-person monthly to promote coordination between the member agencies.

The HOPWA project sponsor participates in each of the seven regional Continuum of Care committees to provide expertise in the area of HIV/AIDS and to officially represent the needs of persons living with HIV/AIDS. DED continues to collaborate and consult with homeless service providers; housing authorities; the Continuums of Care (CoCs); housing developers; non-profit organizations; the Nebraska Investment Finance Authority (NIFA); the Nebraska Commission on Housing and Homelessness (NCHH); and other communities and organizations throughout the state. The goal of this collaboration is to obtain information to administer affordable housing programs effectively, particularly in the areas of special needs housing and permanent supportive housing.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

NHAP gathers input from the CoC governing bodies regarding funding priorities and to identify service needs. NHAP also utilizes HMIS data, Housing Inventory Count (HIC) and Point-in-Time (PIT) counts, Longitudinal Systems Analysis (LSA) reports and prior year's subrecipient data to review past program performance and identified gaps in services across the state. Additionally, the NHAP competitive application process requires reporting of performance measures. Examples include percentage of exits to permanent housing, program participant increase in cash benefits, and percent of returns to homelessness (at 6, 12 and 24 months after exit).

State BoS ESG funds and HSATF funds are allocated through the State's unified funding process. The funding process helps ensure an equitable distribution of funds throughout the entire state. The allocation formula was developed through input from HUD PPRN calculations, the State Continuum of Care and homeless advocacy partners and is periodically reviewed and revised as appropriate.

ESG funding distribution occurs through a competitive grant process in which allocation recommendations from the grant review team are provided. The review team is composed of representatives from the CoC regions, Center for Children Families and the Law (CCFL), DHHS, homeless advocate entities, and other collaborating agencies.

NHAP consults with the executive committees of the regional and state CoCs on performance standards and outcome evaluations for both CoC and ESG funded programs through monthly conference calls in which NHAP regularly participates. During the calls, the focus is to work on gathering and analyzing information to determine the needs of Nebraskans experiencing homelessness, plan and implement strategic responses, develop performance standards as well as evaluating outcomes, and identify and implement endeavors to improve the quality and effectiveness of strategies to prevent and end homelessness. The BoS CoC regularly updates the Written Standards for the ESG/CoC Service Delivery to reflect current HUD regulations and provide guidance on the expectation and requirements of ESG program activities. Updated written standards can be accessed at <https://ccfl.unl.edu/communityservices-management/resources/bos-coc-ne-500>. The written standards can also be viewed in the Appendix.

The HMIS lead agency for the BoS CoC also was selected to implement the Coordinated Entry system for CoC and ESG funded agencies. BoS CoC successfully achieved full compliance with the Coordinated Entry (CE) requirements as established in 24 CFR 578.7(a)(8), 24 CFR 576.400(d) & (e) and Notice CPD-17-01 on January 15th, 2018. For the Coordinated Entry Manual and other resource materials, refer to <https://ccfl.unl.edu/community-services-management/coordinatedentry/coordinated-entry-providers>. The BoS Coordinated Entry System was developed through a Coordinated Entry planning committee comprised of homeless service agencies across the state, the Domestic Violence Coalition, NHAP and other parties. The efforts in developing a Coordinated Entry process led to the “All Doors Lead Home Coordinated Entry”. This established a collaborative approach to find and connect homeless persons as quickly as possible to the most appropriate and effective housing that is housing first, and client-choice driven.

To facilitate the statewide prioritization and placement process for the most vulnerable homeless population in the BoS CoC, the Most Vulnerable Review Team (MVRT) was created by the BoS CoC. By using the “All Doors Lead Home Coordinated Entry” approach, the HMIS Client Profile information and VI-SPDAT assessment score are shared with the Most Vulnerable Review Team (MVRT). The MVRT assembles weekly via conference call to discuss, review and select the most vulnerable homeless population in the BoS CoC who can be best served in Permanent Supportive Housing (PSH), Rapid Rehousing (RRH) and Transition Aged Youth (TAY) programs. This process also allows for a client-driven choice to relocate within all seven CoC regions in Nebraska.

The State also consults CoC System of Care on the development of HMIS policies and procedures. Each month, the BoS CoC will conduct HMIS conference calls to provide on-going training, receive HMIS Regional Coordinator updates, prepare for HUD required reports (HIC/PIT, etc.) and other relevant topics to reporting to the development of policies and procedures for the HMIS system. Additionally, the Nebraska Management Information System (NMIS) will continue to hold quarterly conference calls with all the regional CoCs to ensure unified data standards.

NHAP will continue to utilize ESG and HSATF to provide funding for the HMIS system as administered by the University of Nebraska - Lincoln - Center on Children, Families, and the Law (UNL-CCFL). The Nebraska BoS CoC and the City of Lincoln CoC have selected CCFL as the HMIS Lead. The Omaha CoC (MAACH) has selected Intitute for Community Alliances (ICA) as the HMIS Lead. A single contract is provided by NHAP for HMIS system support to UNL-CCFL which subcontracts to ICA for the Omaha HMIS. To ensure CoC involvement in the competitive funding process utilized for subgranting NHAP funds, the review and selection team for the HMIS provider selection is comprised solely of CoC representatives.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Region 1 Panhandle
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
2	Agency/Group/Organization	Region 2
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
3	Agency/Group/Organization	Region 3
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
4	Agency/Group/Organization	Region 4
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
5	Agency/Group/Organization	Region 5
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
6	Agency/Group/Organization	State CoC
	Agency/Group/Organization Type	CoC Stakeholders & Human Services
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
7	Agency/Group/Organization	Nebraska State Home Builders Association
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
8	Agency/Group/Organization	CDBG Certified Administrators
	Agency/Group/Organization Type	Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.</p>
<p>9</p>	<p>Agency/Group/Organization</p>	<p>Nebraska Commission on Housing and Homelessness (NCHH)</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Public Housing Authority (PHA) Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services – Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders</p>

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.</p>
<p>10</p>	<p>Agency/Group/Organization</p>	<p>Nebraska Community Action Agencies</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Other government - State Other government - County Other government - Local Regional organization</p>

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
11	Agency/Group/Organization	Nebraska County Clerks
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.

12	Agency/Group/Organization	Nebraska Economic Developers Association
	Agency/Group/Organization Type	Housing Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
13	Agency/Group/Organization	Nebraska League of Municipalities
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
14	Agency/Group/Organization	Nebraska Regional Officials Council (NROC)
	Agency/Group/Organization Type	Regional organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
15	Agency/Group/Organization	First Class Nebraska Cities
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.

16	Agency/Group/Organization	Nebraska Villages
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
17	Agency/Group/Organization	Non-Profit Organizations
	Agency/Group/Organization Type	various
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted invitation to participate in survey, public input meetings, and comment on draft plan.
18	Agency/Group/Organization	For Profit Developers
	Agency/Group/Organization Type	Various

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
19	Agency/Group/Organization	Nebraska Investment Finance Authority (NIFA)
	Agency/Group/Organization Type	Quasi-Government
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
20	Agency/Group/Organization	Second Class Nebraska Cities
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted, invitation to participate in survey, public input meetings, and comment on draft plan.
21	Agency/Group/Organization	Nebraska Emergency Management Agency
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - State
	What section of the Plan was addressed by Consultation?	Other: Hazard Mitigation, Disaster Preparedness
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The State consulted with NEMA as the State Agency that manages flood prone areas, public land and water resources, and emergency management. The State has on-going consultation efforts with NEMA in addition to the coordination with NEMA's Hazard Mitigation Plan included in section MA-65.

Identify any Agency Types not consulted and provide rationale for not consulting

The State made every effort to be inclusive in its consultation.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Nebraska Commission on Housing & Homelessness	Opening Doors: Nebraska’s Plan to End Homelessness; Various homeless assistance providers, in consultation with CoCs; consultants; federal and state partners; housing developers; and other interested parties developed the Opening Doors Plan that can be utilized in coordination with the State's Consolidated Plan and Annual Action Plan in helping coordinate efforts, funding, and priorities among different programs aimed at ending homelessness.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))

The State of Nebraska’s Consolidated Plan is a statewide plan. Significant efforts were made during the development of Consolidated Plan in order to obtain the cooperation and coordination of units of general local government. Units of general local government were provided multiple opportunities to participate in the creation and implementation of the Consolidated Plan. The first opportunity was provided through the local governments given the opportunity to complete the Housing and Community Development Survey which was made available to all cities, villages, and municipalities throughout the state. Additional opportunities included the official public comment period for the Consolidated Plan and the Annual Action Plan as well as individual consultations with various communities throughout the state. Although not eligible for State CDBG funds, the entitlement communities of Omaha, Lincoln, Grand Island and Bellevue (as the largest communities within the state) were consulted in order to obtain input for the Consolidated Plan and to determine how CDBG resources might be utilized as well as HOME, HTF, ESG, and HOPWA resources (which are available within the Entitlement Communities as well).

Narrative (optional):

PR-15 Citizen Participation

Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The State undertook a series of steps to engage citizens and stakeholders in the development of this Consolidated Plan. These included the Housing and Community Development Survey (available for the public to complete between November 2019 – April 2020), three public input meetings (January 30, 2020 (in-person); February 6, 2020 (webinar); February 13, 2020 (webinar), and a public hearing (April 14, 2020 - webinar) after the release of the draft plan. Input from these efforts were a part of the Needs Assessment and Market Analysis, and ultimately helped shape the outcome of the Plan's Five Year Goals and Objectives.

The State notified the public via newspaper publications (Lincoln Journal Star, Kearney Hub, Scottsbluff Star Herald, Beatrice Daily Sun, and Norfolk Daily News) and social media outreach, as well as direct emails to agencies and individuals statewide. The State's Outreach included outreach through service providers to reach low-income and minority populations, as well as through the use of Spanish language surveys and publications.

On March 20, 2020, electronic copies of the plan were made available on the Nebraska Department of Economic Development (DED) website and printed copies were made available upon a request or at libraries throughout the State. The libraries included: Alliance Public Library (Alliance), Auburn Memorial Library (Auburn), Garfield County (Burwell), Central City Public Library (Central City), Chadron Public Library (Chadron), Lexington Public Library (Lexington), Bennett Martin Public Library (Lincoln), McCook Public Library (McCook), Jensen Memorial Library (Minden), Goodall City Library (Ogallala), W. Dale Clark Library (Omaha), Scottsbluff Public Library (Scottsbluff), Sidney Public Library (Sidney), Wayne Public Library (Wayne), Thomas County Library (Thedford), and Valentine Public Library (Valentine). Due to COVID-19 many of these libraries were closed. When feasible, libraries made these documents available digitally through social media or their websites. The 30-day public comment period occurred from March 23 to April 21, 2020. A public hearing occurred on April 14, 2020 via webinar in the morning and afternoon.

The Citizen Participation Plan was also updated during this time and was under public comment review March 23 – April 21, 2020. Due to the passage of the CARES Act, the Citizen Participation Plan was again updated to address the additional funding received. Per the HUD Memorandum released April 1, 2020, titled, "Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19", Nebraska identified the use of two waivers. These waivers included: Citizen Participation Public Comment Period for Consolidated Plan Amendment and Citizen Participation Reasonable Notice and Opportunity to Comment. Nebraska held another public comment review on the Citizen Participation Plan May 26 – May 30, 2020. No public comments were received concerning the Citizen Participation Plan.

Copies of the State's prior and current Consolidated Plan, Annual Action Plan (AAP), Consolidated Annual Performance Evaluation Report (CAPER), and the Citizen Participation Plan may be obtained by accessing the Department's website at: <http://www.opportunity.nebraska.gov/reports> or by contacting the Consolidated Plan Coordinator identified at the beginning of this document.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet outreach	Non-targeted/broad community Non-English Speaking - Specify other language: Spanish	A total of 985 surveys were received throughout the State. The survey was available in both English and Spanish.	The results are available as part of the Needs Assessment and Market Analysis.	Not applicable.	
2	Public Meeting	Non-targeted/broad community	Three public input meetings were held on January 30, February 6, and February 13.	A complete set of transcripts from the meeting is included in the Appendix. Comments included the barrier of NIMBYism in communities, the difficulties for persons with disabilities, and the need for affordable housing.	Not applicable.	
3	Public Hearing	Non-targeted/broad community Stakeholders	A public hearing was held during the public review period on April 14, 2020 via webinar due to the COVID-19 health concern. The 30-day public comment period occurred March 23 – April 21, 2020.	A complete set of transcripts from the meeting is included in the Appendix. One comment indicated the limitations providers face with minimum grant requirements.	Not applicable.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The following section will describe the socio-economic and housing situation in the State of Nebraska Non-Entitlement. The Entitlements in the State of Nebraska are Bellevue, Grand Island, Lincoln and Omaha. The Non-Entitlement areas of the State is the balance of the area outside of these four cities.

The population in the State of Nebraska Non-Entitlement fell from 1,060,347 persons in 2010 to 1,054,387 persons in 2018. There has not been a significant change in the racial or ethnic makeup of the Area. Households with income over \$100,000 have grown as a proportion of the population, while conversely, poverty has also grown. The proportion of persons in poverty has grown from 9.0 percent in 2000 to 9.6 percent in 2018.

A significant proportion of households have housing problems, particularly cost burdens, with 20.8 percent of households experiencing cost burdens. Renter households are particularly impacted by cost burdens, at a rate of 32.6 percent. In addition, black, Asian, American Indian, and Hispanic households face housing problems at a disproportionate rate.

The homeless population continues to need a variety of services, as the homeless population remained steady since 2014, from 560 persons in the Nebraska Balance of State Continuum of Care to 506 persons in 2019, according to Point-in-Time counts. In addition, there are a variety of non-homeless special needs populations in the area. This includes the elderly population, which has grown by 14.0 percent since 2010.

The following Needs Assessment and Market Analysis include two different table types. The first is the default data sets that come from the eCon Planning Suite. These tables are yellow. The second is a set of tables that has the most up-to-date data available for Nebraska. These tables are blue. Most of the narrative in the following sections will reference the blue tables by table number.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	1,826,341	1,869,365	2%
Households	702,637	736,613	5%
Median Income	\$47,995.00	\$52,997.00	10%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Population Estimates

The State of Nebraska Non-Entitlement population by race and ethnicity is shown in NA-10.1. The white population represented 92.7 percent of the population in 2018, compared with the black population, which accounted for 1.5 percent of the population. The Hispanic population represented 8.9 percent of the population in 2018, compared to 7.4 percent in 2010.

Table NA-10 1				
Population by Race and Ethnicity				
State of Nebraska Non-Entitlement				
2010 Census & 2018 Five-Year ACS				
Race	2010 Census		2018 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	971,967	91.7%	977,428	92.7%
Black	13,090	1.2%	16,175	1.5%
American Indian	12,112	1.1%	11,910	1.1%
Asian	10,765	1.0%	11,361	1.1%
Native Hawaiian/ Pacific Islander	602	0.1%	571	0.1%
Other	35,319	3.3%	16,764	1.6%
Two or More Races	16,492	1.6%	20,178	1.9%
Total	1,060,347	100.0%	1,054,387	100.0%
Non-Hispanic	981,572	92.6%	960,981	91.1%
Hispanic	78,775	7.4%	93,406	8.9%

The change in race and ethnicity between 2010 and 2018 is shown in Table NA-10.2. During this time, the total non-Hispanic population was 960,981 persons in 2018. The Hispanic population was 93,406.

Table NA-10 2				
Population by Race and Ethnicity				
State of Nebraska Non-Entitlement 2010 Census & 2018 Five-Year ACS				
Race	2010 Census		2018 Five-Year ACS	
	Population	% of Total	Population	% of Total
Non-Hispanic				
White	935,298	95.3%	907,019	94.4%
Black	12,469	1.3%	15,156	1.6%
American Indian	10,452	1.1%	10,295	1.1%
Asian	10,612	1.1%	11,284	1.2%
Native Hawaiian/ Pacific Islander	462.0	0.0%	388	0.0%
Other	780	0.1%	566	0.1%
Two or More Races	11,499	1.2%	16,273	1.7%
Total Non-Hispanic	981,572	100.0%	960,981	100.0%
Hispanic				
White	36,669	46.5%	70,409	75.4%
Black	621	0.8%	1,019	1.1%
American Indian	1,660	2.1%	1,615	1.7%
Asian	153.0	0.2%	77	0.1%
Native Hawaiian/ Pacific Islander	140.0	0.2%	183	0.2%
Other	34,539	43.8%	16,198	17.3%
Two or More Races	4,993	6.3%	3,905	4.2%
Total Hispanic	78,775	100.0	93,406	100.0%
Total Population	1,060,347	100.0%	1,054,387	100.0%

The group quarters population includes the institutionalized population, who live in correctional institutions, juvenile facilities, nursing homes, and other institutions, and the non-institutionalized population, who live in college dormitories, military quarters, and other group living situations. As seen in Table NA-10.3, between 2000 and 2010, the institutionalized population changed -11.4 percent in State of Nebraska Non-Entitlement, from 15,691 people in 2000 to 13,909 in 2010. The non-institutionalized population changed -2.0%, from 11,589 in 2000 to 11,362 in 2010.

Table NA-10 3					
Group Quarters Population					
State of Nebraska Non-Entitlement 2000 & 2010 Census SF1 Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	1,561	9.9%	2,838	20.4%	81.8%
Juvenile Facilities	.	.	1,093	7.9%	.
Nursing Homes	11,696	74.5%	9,955	71.6%	-14.9%
Other Institutions	2,434	15.5%	23.0	0.2%	-99.1%
Total	15,691	100.0%	13,909	100.0%	-11.4%
Non-institutionalized					
College Dormitories	8,466	73.1%	8,918	78.5%	5.3%
Military Quarters	587	5.1%	443	3.9%	-24.5%
Other Non-institutionalized	2,536	21.9%	2,001	17.6%	-21.1%
Total	11,589	100.0%	11,362	100.0%	-2.0%
Group Quarters Population	27,280	100.0%	25,271	100.0%	-7.4%

Households by type and tenure are shown in Table NA-10.4. Family households represented 67.7 percent of households, while non-family households accounted for 32.3 percent. These changed from 68.3 and 31.7 percent, respectively.

Table NA-10 4				
Household Type by Tenure				
State of Nebraska Non-Entitlement				
2010 Census SF1 & 2018 Five-Year ACS Data				
Household Type	2010 Census		2018 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	285,212	68.3%	283,651	67.7%
Married-Couple Family	235,962	82.7%	234,273	82.6%
Owner-Occupied	203,965	86.4%	202,699	86.5%
Renter-Occupied	31,997	13.6%	31,574	13.5%
Other Family	49,250	17.3%	49,378	17.4%
Male Householder, No Spouse Present	16,084	32.7%	15,904	32.6%
Owner-Occupied	9,566	59.5%	9,683	60.9%
Renter-Occupied	6,518	40.5%	6,221	39.1%
Female Householder, No Spouse Present	33,166	67.3%	33,474	67.2%
Owner-Occupied	17,556	52.9%	17,251	51.5%
Renter-Occupied	15,610	47.1%	16,223	48.5%
Non-Family Households	132,277	31.7%	135,613	32.3%
Owner-Occupied	74,199	56.1%	74,636	55.0%
Renter-Occupied	58,078	43.9%	60,977	45.0%
Total	417,489	100.0%	419,264	100.0%

Household Income and Poverty

Households by income for the 2010 and 2018 5-year ACS are shown in Table NA-10.5. Households earning more than 100,000 dollars per year represented 25.3 percent of households in 2018, compared to 16.1 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 8.8 percent of households in 2018, compared to 11.4 percent in 2000.

Table NA-10 5				
Households by Income				
State of Nebraska Non-Entitlement				
2010 & 2018 Five-Year ACS Data				
Income	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	46,473	11.4%	36,788	8.8%
\$15,000 to \$19,999	22,506	5.5%	17,839	4.3%
\$20,000 to \$24,999	23,923	5.8%	19,303	4.6%
\$25,000 to \$34,999	46,679	11.4%	40,536	9.7%
\$35,000 to \$49,999	62,957	15.4%	56,444	13.5%
\$50,000 to \$74,999	86,421	21.1%	82,153	19.6%
\$75,000 to \$99,999	54,471	13.3%	60,128	14.3%
\$100,000 or More	65,803	16.1%	106,073	25.3%
Total	409,233	100.0%	419,264	100.0%

The rate of poverty for State of Nebraska Non-Entitlement is shown in Table NA-10.6. In 2018, there were an estimated 98,880 people or 9.6 percent living in poverty, compared to 9.0 percent living in poverty in 2000. In 2018, some 13.1 percent of those in poverty were under age 6 and 12.8 percent were 65 or older.

Table NA-10 6 Poverty by Age State of Nebraska Non-Entitlement 2000 Census SF3 & 2018 Five-Year ACS Data				
Age	2000 Census		2018 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	10,237	11.5%	12,243	12.4%
6 to 17	19,906	22.5%	19,341	19.6%
18 to 64	46,303	52.2%	54,312	54.9%
65 or Older	12,210	13.8%	12,984	13.1%
Total	88,656	100.0%	98,880	100.0%
Poverty Rate	9.0%	.	9.6%	.

Number of Households Table

HAMFI stands for HUD Area Median Family Income.

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	91,595	94,435	137,430	83,825	329,330
Small Family Households	23,500	25,490	46,490	33,860	176,305
Large Family Households	6,140	7,780	11,685	8,315	30,675
Household contains at least one person 62-74 years of age	12,945	16,895	24,990	16,200	65,665
Household contains at least one person age 75 or older	16,645	20,230	19,695	8,150	20,480
Households with one or more children 6 years old or younger	16,535	16,340	23,410	15,100	38,730

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% % AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% % AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	2,130	1,735	1,465	390	5,720	455	270	395	200	1,320

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	640	795	725	190	2,350	30	140	210	155	535
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	2,235	1,685	1,580	470	5,970	540	975	1,420	560	3,495
Housing cost burden greater than 50% of income (and none of the above problems)	34,045	6,795	1,095	160	42,095	15,015	8,140	4,380	1,075	28,610
Housing cost burden greater than 30% of income (and none of the above problems)	9,650	23,305	10,705	835	44,495	6,300	12,910	18,425	7,650	45,285
Zero/negative Income (and none of the above problems)	4,075	0	0	0	4,075	2,515	0	0	0	2,515

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	39,045	11,005	4,860	1,215	56,125	16,045	9,525	6,405	1,985	33,960
Having none of four housing problems	18,595	39,895	54,190	25,280	137,960	11,320	34,010	71,970	55,350	172,650

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	4,075	0	0	0	4,075	2,515	0	0	0	2,515

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	14,605	10,540	3,655	28,800	4,775	5,805	9,230	19,810
Large Related	3,550	1,910	515	5,975	1,570	2,365	2,185	6,120
Elderly	8,685	6,385	3,170	18,240	11,005	9,735	6,760	27,500
Other	20,755	13,475	5,165	39,395	4,675	3,830	5,120	13,625
Total need by income	47,595	32,310	12,505	92,410	22,025	21,735	23,295	67,055

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	11,510	1,665	125	13,300	3,565	2,225	1,675	7,465
Large Related	2,675	435	0	3,110	1,200	750	290	2,240

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	6,465	2,400	1,175	10,040	7,045	3,405	1,510	11,960
Other	16,505	3,065	195	19,765	3,760	1,900	1,070	6,730
Total need by income	37,155	7,565	1,495	46,215	15,570	8,280	4,545	28,395

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	2,530	2,080	1,850	490	6,950	515	935	1,355	550	3,355
Multiple, unrelated family households	250	300	390	145	1,085	59	190	284	170	703
Other, non-family households	90	150	170	25	435	0	4	0	4	8
Total need by income	2,870	2,530	2,410	660	8,470	574	1,129	1,639	724	4,066

Table 11 – Crowding Information - 1/2

Data Source: 2011-2015 CHAS

Housing Problems

The Census identified the following four housing problems in the CHAS data. Households are considered to have housing problems if they have one of more of the four problems.

1. Housing unit lacks complete kitchen facilities;
2. Housing unit lacks complete plumbing facilities;
3. Household is overcrowded; and
4. Household is cost burdened.

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table NA-10.7. In 2018, an estimated 1.3 percent of households were overcrowded, and an additional 0.3 percent were severely overcrowded.

Table NA-10 7 Overcrowding and Severe Overcrowding State of Nebraska Non-Entitlement 2010 & 2018 Five-Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	302,176	99.1%	2,082	0.7%	571	0.2%	304,829
2018 Five-Year ACS	301,002	98.9%	2,736	0.9%	531	0.2%	304,269
Renter							
2010 Five-Year ACS	101,707	97.4%	2,254	2.2%	443	0.4%	104,404
2018 Five-Year ACS	111,402	96.9%	2,853	2.5%	740	0.6%	114,995
Total							
2010 Five-Year ACS	403,883	98.7%	4,336	1.1%	1,014	0.2%	409,233
2018 Five-Year ACS	412,404	98.4%	5,589	1.3%	1,271	0.3%	419,264

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. This data is displayed in Table NA-10.8 and Table NA-10.9.

There was a total of 1,363 households with incomplete plumbing facilities in 2018, representing 0.3 percent of households in State of Nebraska Non-Entitlement. This is compared to 0.4 percent of households lacking complete plumbing facilities in 2010.

Table NA-10 8 Households with Incomplete Plumbing Facilities 2010 and 2018 Five-Year ACS Data		
Households	2010 Five-Year ACS	2018 Five-Year ACS
With Complete Plumbing Facilities	407,730	417,901
Lacking Complete Plumbing Facilities	1,503	1,363
Total Households	409,233	419,264
Percent Lacking	0.4%	0.3%

There were 4,764 households lacking complete kitchen facilities in 2018, compared to 3,441 households in 2010. This was a change from 0.8 percent of households in 2010 to 1.1 percent in 2018.

Table NA-10 9 Households with Incomplete Kitchen Facilities State of Nebraska Non-Entitlement 2010 and 2018 Five-Year ACS Data		
Households	2010 Five-Year ACS	2018 Five-Year ACS
With Complete Kitchen Facilities	405,792	414,500
Lacking Complete Kitchen Facilities	3,441	4,764
Total Households	409,233	419,264
Percent Lacking	0.8%	1.1%

In addition to occupied homes that lack basic kitchen and plumbing facilities, there were an estimated 1,414 occupied homes that experienced major to severe damage in the flood events of 2019. There is an

active disaster-response network of organizations assisting owners to repair these homes, but there are homes that remain damaged and owners do not have the resources to rebuild or repair. Families are either living in these flood-damaged homes, potentially experiencing health risks due to mold, or are living in temporary housing and face potential homelessness as disaster-related services expire. The State of Nebraska is working with local and national disaster response organizations and HUD to monitor housing needs and track recovery. In April 2020, Nebraska's Department of Economic Development administered a survey to impacted communities to identify homes in need of repair. The results of this survey identified 184 occupied homes that may need additional assistance to rebuild or repair damages.

Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

As seen in Table NA-10.10, in the State of Nebraska Non-Entitlement 12.7 percent of households had a cost burden and 8.1 percent had a severe cost burden. Some 18.3 percent of renters were cost burdened, and 14.3 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 7.2 percent and a severe cost burden rate of 4.8 percent. Owner occupied households with a mortgage had a cost burden rate of 13.1 percent, and severe cost burden at 6.5 percent.

Table NA-10 10									
Cost Burden and Severe Cost Burden by Tenure									
State of Nebraska Non-Entitlement									
2010 & 2018 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	136,603	74.8%	31,384	17.2%	14,143	7.7%	411.0	0.2%	182,541
2018 Five-Year ACS	137,865	80.1%	22,519	13.1%	11,268	6.5%	565	0.3%	172,217
Owner Without a Mortgage									
2010 Five-Year ACS	104,513	85.5%	10,487	8.6%	6,547	5.4%	741	0.6%	122,288
2018 Five-Year ACS	115,031	87.1%	9,523	7.2%	6,284	4.8%	1,214	0.9%	132,052
Renter									
2010 Five-Year ACS	56,452	54.1%	19,142	18.3%	15,214	14.6%	13,596	13.0%	104,404
2018 Five-Year ACS	64,588	56.2%	21,092	18.3%	16,436	14.3%	12,879	11.2%	114,995
Total									
2010 Five-Year ACS	297,568	72.7%	61,013	14.9%	35,904	8.8%	14,748	3.6%	409,233
2018 Five-Year ACS	317,484	75.7%	53,134	12.7%	33,988	8.1%	14,658	3.5%	419,264

Describe the number and type of single person households in need of housing assistance.

There were 112,278 one-person households in the State of Nebraska Non-Entitlement in 2017. These one-person households that are below 30 percent HUD Area Median Family Income (HAMFI) are the most likely to need housing assistance in the area.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disability by age, as estimated by the 2018 ACS, is shown in Table NA-10.11, below. The disability rate for females was 11.4 percent, compared to 12.4 percent for males. The disability rate grew precipitously higher with age, with 47.0 percent of those over 75 experiencing a disability.

Table NA-10 11 Disability by Age State of Nebraska Non-Entitlement 2018 Five-Year ACS Data						
Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	331	0.9%	315	0.9%	646	0.9%
5 to 17	5,548	5.6%	3,765	4.0%	9,313	4.8%
18 to 34	6,547	6.3%	5,178	5.0%	11,725	5.7%
35 to 64	23,148	11.6%	20,759	10.5%	43,907	11.1%
65 to 74	13,032	28.2%	10,042	20.7%	23,074	24.4%
75 or Older	15,628	50.1%	18,978	44.7%	34,606	47.0%
Total	64,234	12.4%	59,037	11.4%	123,271	11.9%

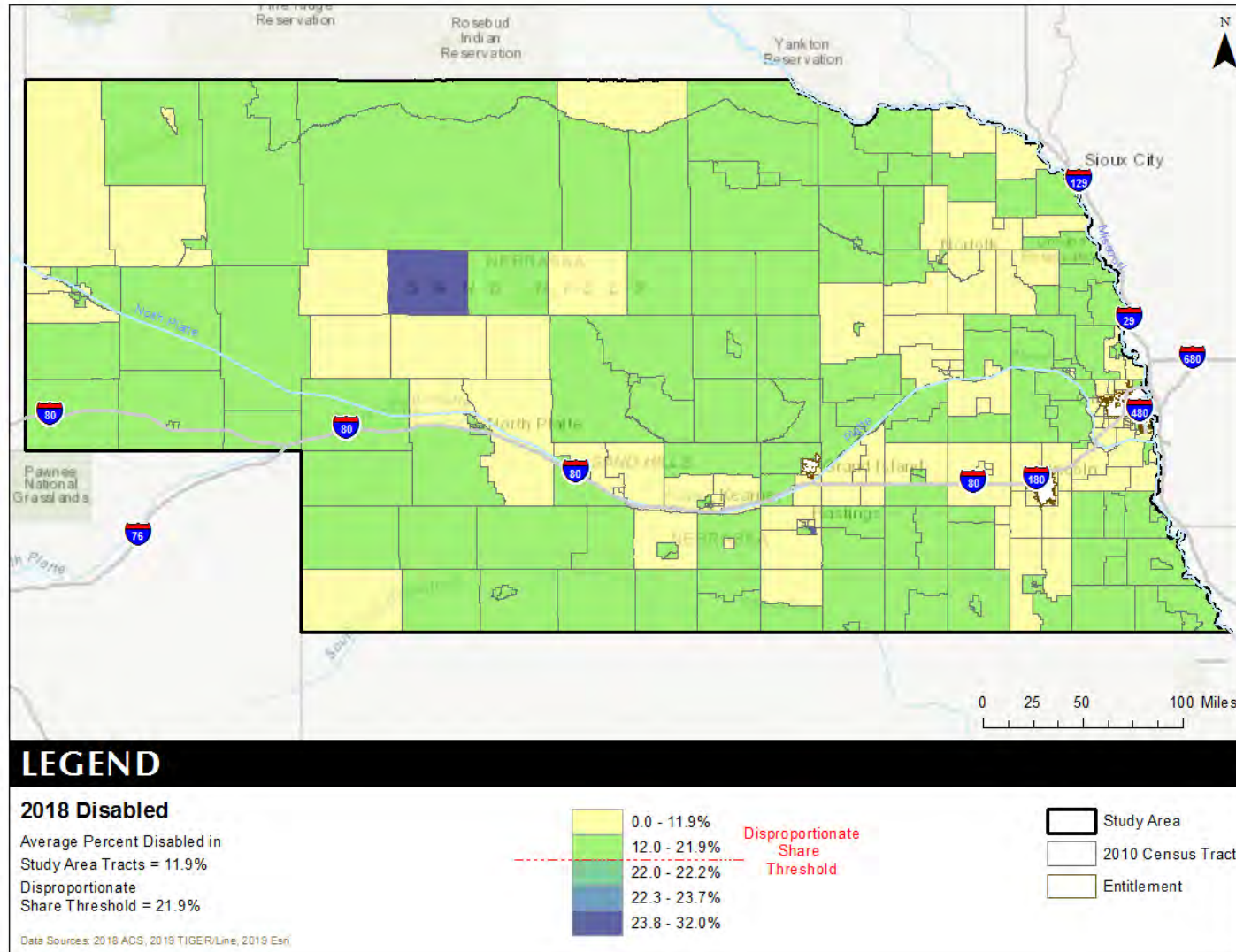
The number of disabilities by type, as estimated by the 2018 ACS, is shown in Table NA-10.12. Some 6.0 percent have an ambulatory disability, 4.5 have an independent living disability, and 1.9 percent have a self-care disability.

Table NA-10 12 Total Disabilities Tallied: Aged 5 and Older State of Nebraska Non-Entitlement 2018 Five-Year ACS		
Disability Type	Population with Disability	Percent with Disability
Hearing disability	45,767	4.4%
Vision disability	20,879	2.0%
Cognitive disability	38,656	4.0%
Ambulatory disability	58,088	6.0%
Self-Care disability	18,636	1.9%
Independent living disability	34,380	4.5%

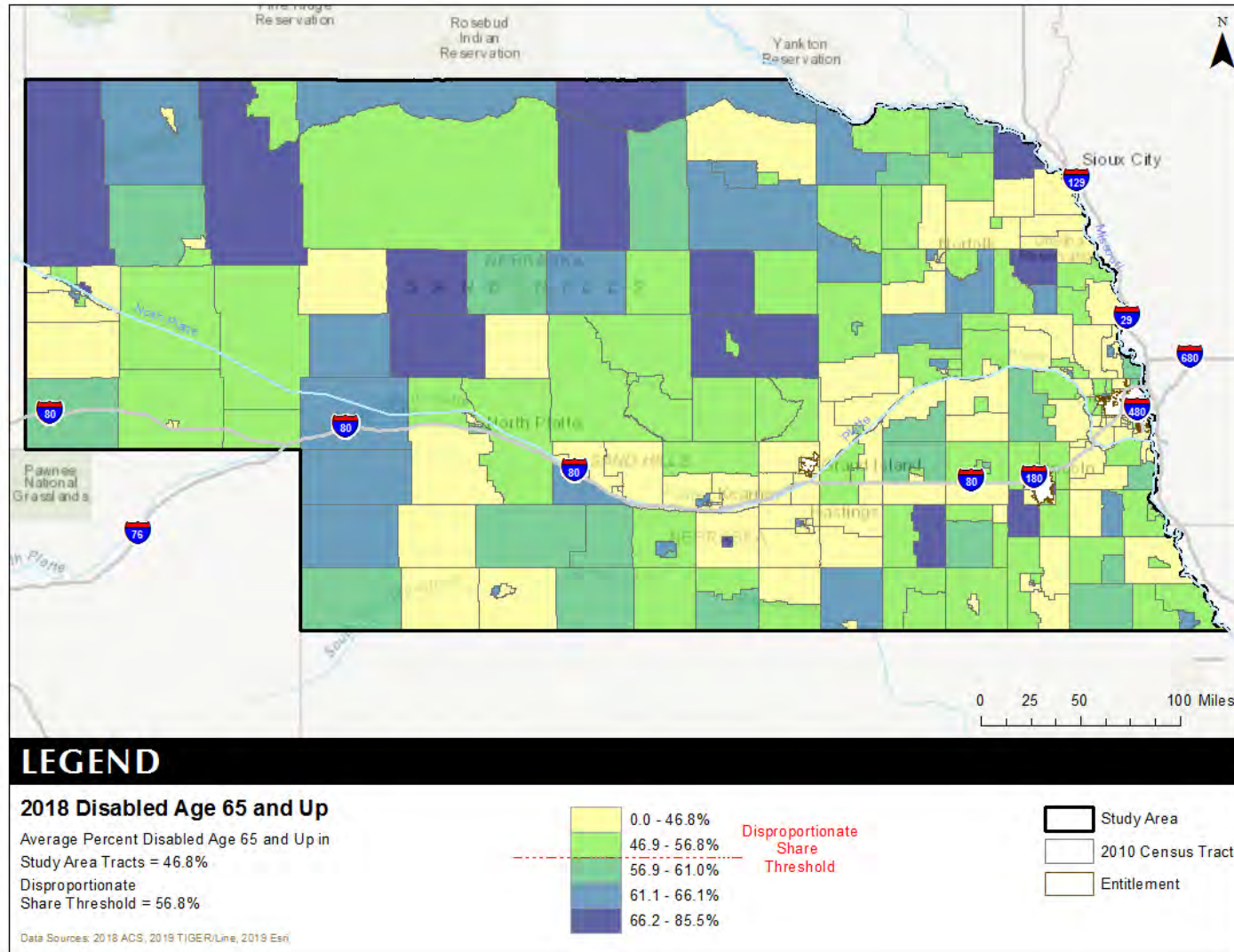
Pinpointing specific numbers of domestic violence victims is difficult due to the lack of reporting and other mitigating factors. According to the Nebraska Coalition to End Sexual and Domestic Abuse, 17,300 persons in 2017 were served. This included 11,565 adult females, 1,308 adult males, and 3,904 children and youth.¹

¹ http://dhhs.ne.gov/WHI%20Docs/WHI_Trends_SexualAssault.pdf

Map NA-10.1
2018 Persons with Disabilities
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Map NA-10.2
2018 Persons with Disabilities Age 65 and Older
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



What are the most common housing problems?

Cost burdens are the most common housing problem in the non-entitlement areas of the State, by far. Housing cost burdens between 31 and 50 percent of income impact 12.7 percent of households in the non-entitlement areas of the State. Severe cost burdens over 50 percent of income impact 8.1 percent of households. These housing problems impact 20.8 percent of the total population in the non-entitlement areas of the State.

Table NA-10 14
Cost Burden and Severe Cost Burden by Tenure
 State of Nebraska Non-Entitlement
 2010 & 2018 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	136,603	74.8%	31,384	17.2%	14,143	7.7%	411.0	0.2%	182,541
2018 Five-Year ACS	137,865	80.1%	22,519	13.1%	11,268	6.5%	565	0.3%	172,217
Owner Without a Mortgage									
2010 Five-Year ACS	104,513	85.5%	10,487	8.6%	6,547	5.4%	741	0.6%	122,288
2018 Five-Year ACS	115,031	87.1%	9,523	7.2%	6,284	4.8%	1,214	0.9%	132,052
Renter									
2010 Five-Year ACS	56,452	54.1%	19,142	18.3%	15,214	14.6%	13,596	13.0%	104,404
2018 Five-Year ACS	64,588	56.2%	21,092	18.3%	16,436	14.3%	12,879	11.2%	114,995
Total									
2010 Five-Year ACS	297,568	72.7%	61,013	14.9%	35,904	8.8%	14,748	3.6%	409,233
2018 Five-Year ACS	317,484	75.7%	53,134	12.7%	33,988	8.1%	14,658	3.5%	419,264

Are any populations/household types more affected than others by these problems?

For homeowners with a mortgage, an estimated 19.6 percent face cost burdens or severe cost burdens. Elderly non-family households experience cost burdens at a higher rate, at 30.2 percent. At lower income levels, large and small families experience cost burdens at a higher rate. Large families below 30 percent HUD Area Median Family Income (HAMFI) face housing problems at a rate of 77.2 percent. Below 30 percent HAMFI, small families face housing problems at a rate of 81.1 percent. These data are shown in Table NA-10.14.

Renters are more likely to experience cost burdens than owner households, at a rate of 32.6 percent for all renter households in the non-entitlement areas of the State. Elderly non-family households experience the highest rate of cost burdens overall, for renter households, at 45.6 percent. As seen with owner households, lower income large family and small family renter households experience cost burdens at the highest rate. Small families below 30 percent HAMFI experience cost burdens at a rate of 78.5 percent. Large families with incomes below 30 percent HAMFI experience cost burdens at a rate of 82.3 percent. These data are shown in Table NA-10.15.

Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Households most likely to be at risk of becoming unsheltered are those that with extremely low incomes that are severely cost-burdened. There are 21,525 households in the non-entitlement areas of the State that are below 30 percent HAMFI with severe cost burdens. These 8,750 homeowner households and 12,775 renter households are the most at-risk of becoming homeless.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not applicable.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

According to the National Alliance to End Homelessness, there are various factors that contribute to an increased risk of homelessness. These housing characteristics include households that are doubled up, or living with friends or family, persons recently released from prison, and young adults out of foster care. Economic factors include households with severe cost burden and households facing unemployment. As described here and in the following sections, there are a large number of households facing cost burdens and other housing problems that create instability and increase their risk of homelessness.

Discussion

The population in the State of Nebraska Non-Entitlement declined slightly between 2010 and 2018. There has not been significant changes in the racial and ethnic makeup of the area. Income disparity is growing, with households earning more than \$100,000 a year growing to account for 25.3 percent of the population in 2018. Meanwhile, persons in poverty grew slightly from 9.0 percent of the population in 2000 to 9.6 percent of the population in 2018.

Over a fifth of all households have housing problems, particularly cost burdens, with 21.0 percent of households experiencing cost burdens. Renter households are particularly impacted by cost burdens, at a rate of 30.7 percent.

CDBG-DR Housing Impact and Needs Assessment:

To determine how many housing units would require funding through the CDBG-DR program, DED conducted a data analysis to review the total number of homes served through existing State housing programs. In partnership with NIFA, DED worked alongside federal partners (e.g., HUD, FEMA, USDA), local jurisdictions, and a consortium of volunteer agencies to assess unmet needs and assist communities with rebuilding. DED staff assisted in the formation of, and continue to participate in, the Long-Term Recovery Groups (LTRG). The ongoing efforts of these groups demonstrate that many alternative private, public, and non-profit resources have and continue to address a significant amount of unmet need resulting from the flood events. To facilitate a resilient and equitable recovery, DED staff continues to

participate in discussions with housing advocacy groups, particularly in the HUD-identified most-impacted and distressed (MID) areas, including the counties of Dodge, Douglas, and Sarpy.

Refer to the CDBG-DR Action Plan for more information.

Table NA-10 15						
Owner-Occupied Households by Income and Family Status and Cost Burden						
State of Nebraska Non-Entitlement						
2012–2016 HUD CHAS Data						
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Cost Burden						
\$0 to \$23,430	565	685	200	2,285	681	4,416
\$23,431 to \$39,050	1,530	1,745	590	2,255	980	7,100
\$39,051 to \$62,480	1,855	3,670	950	1,405	2,270	10,150
\$62,481 to \$78,100	585	2,075	535.0	311	761	4,267
Above \$78,100	881	2,900	455.0	235	756	5,227
Total	5,416	11,075	2,730	6,491	5,448	31,160
Severe Cost Burden						
\$0 to \$23,430	990	2,025	495	3,485	1,755	8,750
\$23,431 to \$39,050	840	1,160	390	1,280	900	4,570
\$39,051 to \$62,480	525	980	185	470	480	2,640
\$62,481 to \$78,100	110	280	90	40	86	606
Above \$78,100	110	300	35	31	30	506
Total	2,575	4,745	1,195	5,306	3,251	17,072
Total						
\$0 to \$23,430	2,245	3,340	900	8,510	3,486	18,481
\$23,431 to \$39,050	6,385	5,010	1,856	9,555	3,405	26,211
\$39,051 to \$62,480	12,990	15,420	4,440	9,110	7,750	49,710
\$62,481 to \$78,100	8,405	14,830	4,190	3,521	5,162	36,108
Above \$78,100	34,951	96,905	17,975	8,296	15,186	173,313
Total	64,976	135,505	29,361	38,992	34,989	303,823

Table NA-10 16						
Renter-Occupied Households by Income and Family Status and Cost Burden						
State of Nebraska Non-Entitlement 2012–2016 HUD CHAS Data						
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Cost Burden						
\$0 to \$23,430	70	1,370	285	1,145	1,515	4,385
\$23,431 to \$39,050	500	3,430	520	1,875	3,340	9,665
\$39,051 to \$62,480	215	1,520	165	740	1,650	4,290
\$62,481 to \$78,100	10	166	40	75	171	462
Above \$78,100	50	30	35	170	25	310
Total	845	6,516	1,045	4,005	6,701	19,112
Severe Cost Burden						
\$0 to \$23,430	225	3,790	885	2,955	4,920	12,775
\$23,431 to \$39,050	95	665	71	915	765	2,511
\$39,051 to \$62,480	70	25	4	425	75	599
\$62,481 to \$78,100	20	5	4	55	50	134
Above \$78,100	6	0	0	110	6	122
Total	416	4,485	964	4,460	5,816	16,141
Total						
\$0 to \$23,430	521	6,575	1,421	6,965	9,055	24,537
\$23,431 to \$39,050	1,090	7,075	1,431	5,145	7,010	21,751
\$39,051 to \$62,480	1,370	10,065	2,199	3,355	11,015	28,004
\$62,481 to \$78,100	625	6,421	1,414	1,120	4,791	14,371
Above \$78,100	1,831	12,085	1,850	1,965	8,466	26,197
Total	5,437	42,221	8,315	18,550	40,337	114,860

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Discussed in NA-30.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	71,243	14,413	6,789
White	52,279	11,592	4,575
Black / African American	7,754	1,380	885
Asian	1,641	202	318
American Indian, Alaska Native	1,220	207	104
Pacific Islander	34	0	0
Hispanic	6,992	838	674

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	56,942	38,055	0
White	43,317	31,115	0
Black / African American	4,582	2,103	0
Asian	1,149	380	0
American Indian, Alaska Native	436	247	0
Pacific Islander	73	10	0
Hispanic	6,777	3,667	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	40,609	97,186	0
White	33,444	81,212	0
Black / African American	1,784	4,489	0
Asian	636	1,658	0
American Indian, Alaska Native	201	670	0
Pacific Islander	10	120	0
Hispanic	4,116	8,047	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,930	72,231	0
White	10,503	63,031	0
Black / African American	334	2,399	0
Asian	207	948	0
American Indian, Alaska Native	52	235	0
Pacific Islander	0	39	0
Hispanic	801	5,050	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion Discussed in NA-30.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Discussed in NA-30.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	55,406	30,351	6,789
White	40,157	23,787	4,575
Black / African American	6,066	3,073	885
Asian	1,342	490	318
American Indian, Alaska Native	1,014	438	104
Pacific Islander	34	0	0
Hispanic	5,703	2,144	674

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,847	74,107	0
White	15,577	58,783	0
Black / African American	1,563	5,127	0
Asian	622	905	0
American Indian, Alaska Native	141	559	0
Pacific Islander	50	34	0
Hispanic	2,713	7,690	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,401	126,179	0
White	8,510	105,965	0
Black / African American	477	5,798	0
Asian	268	2,028	0
American Indian, Alaska Native	97	774	0
Pacific Islander	0	130	0
Hispanic	1,972	10,190	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,307	80,738	0
White	2,450	70,939	0
Black / African American	140	2,593	0
Asian	119	1,032	0
American Indian, Alaska Native	44	239	0
Pacific Islander	0	39	0
Hispanic	540	5,312	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion Discussed in NA-30.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Discussed in NA-30.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	549,030	103,899	77,593	7,169
White	484,707	83,625	60,211	4,797
Black / African American	16,997	6,545	7,202	910
Asian	8,252	1,740	1,461	322
American Indian, Alaska Native	2,419	732	946	119
Pacific Islander	393	33	34	0
Hispanic	31,502	9,177	6,422	816

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

Discussed in NA-30.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The following tables show households with housing problems by race/ethnicity. These tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or higher than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their income on housing).

Black, Asian, American Indian, and Hispanic households face a disproportionate share of housing problems. The statewide average rate of housing problems is 26 percent, while the black households face housing problems at a rate of 46.8 percent, Asian households at a rate of 37 percent, American Indian households at a rate of 43.3 percent, and 38.9 percent for Hispanic households.

Table NA-30.1 Percent of Total Households with Housing Problems by Income and Race State of Nebraska 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	76.2%	77.6%	77.8%	76.3%	100%	73.2%	83.8%	77%
\$23,431 to \$39,050	57.9%	67.2%	70.7%	60.4%	88.2%	59.4%	64.1%	59.5%
\$39,051 to \$62,480	28%	30%	29.7%	25.6%	29.2%	25.7%	28.4%	28.1%
\$62,481 to \$78,100	12.6%	10.2%	23.3%	13.6%	0%	6.4%	13.6%	12.7%
Above \$78,100	3.8%	4.9%	8.7%	8%	0%	2.9%	6.2%	4%
Total	23.5%	46.8%	37%	43.3%	33.7%	33.9%	38.9%	26%
Without Housing Problems								
\$0 to \$23,430	16.9%	13.2%	6.8%	20.2%	0%	13.4%	8.3%	15.4%
\$23,431 to \$39,050	42.1%	32.8%	29.3%	39.6%	11.8%	40.6%	35.9%	40.5%
\$39,051 to \$62,480	72%	70%	70.3%	74.4%	70.8%	74.3%	71.6%	71.9%
\$62,481 to \$78,100	87.4%	89.8%	76.7%	86.4%	100%	93.6%	86.4%	87.3%
Above \$78,100	96.2%	95.1%	91.3%	92%	100%	97.1%	93.8%	96%
Total	75.8%	50.3%	59.8%	55.6%	66.3%	62.9%	59.7%	73.1%

If they have needs not identified above, what are those needs?

No other needs identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

American Indian and Hispanic households are found at disproportionate rates in the non-entitlement areas of the State. These are shown and described in MA-50.

Table NA-30 2 Total Households with Housing Problems by Income and Race State of Nebraska Non-Entitlement 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	26,190	725	320	680	6	390	2,780	31,091
\$23,431 to \$39,050	21,500	410	170	305	71	305	2,390	25,151
\$39,051 to \$62,480	17,780	295	101	125	0	210	1,655	20,166
\$62,481 to \$78,100	6,030	95	115	41	0	20	440	6,741
Above \$78,100	7,685	81	131	35	0	25	385	8,342
Total	79,185	1,606	837	1,186	77	950	7,650	91,491
Total								
\$0 to \$23,430	36,740	950	400	950	6	556	3,395	42,997
\$23,431 to \$39,050	41,765	610	255	548	71	530	4,210	47,989
\$39,051 to \$62,480	69,015	740	466	575	60	785	6,065	77,706
\$62,481 to \$78,100	45,965	485	365	263	25	380	3,005	50,488
Above \$78,100	187,675	1,516	1,746	590	112	1,311	6,570	199,520
Total	381,160	4,301	3,232	2,926	274	3,562	23,245	418,700

NA-35 Public Housing – 91.205(b)

Introduction

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	139	6,902	11,225	86	10,751	144	30	129

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	76	8	0	8	0	0
# of Elderly Program Participants (>62)	0	13	2,452	1,732	30	1,650	9	0
# of Disabled Families	0	18	1,519	3,166	23	2,939	90	1
# of Families requesting accessibility features	0	139	6,902	11,225	86	10,751	144	30
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	24	4,798	6,474	71	6,179	99	18	71
Black/African American	0	111	1,986	4,377	13	4,208	41	12	56
Asian	0	0	23	124	1	120	1	0	0
American Indian/Alaska Native	0	2	85	220	1	215	3	0	1
Pacific Islander	0	2	10	29	0	28	0	0	1
Other	0	0	0	1	0	1	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	5	331	615	5	592	4	3	7
Not Hispanic	0	134	6,571	10,610	81	10,159	140	27	122

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Nebraska Balance of State (BoS) Continuum of Care (CoC) covers the entirety of the State outside of Omaha and Lincoln. The BoS CoC counted 560 homeless persons in 2014, which has remained relatively steady and resulted in 506 persons counted in 2019. The following tables describe the outcome of the 2019 Point-in-Time count for the BoS CoC.

Table NA-40 1 Homeless Persons State of Nebraska Non-Entitlement Point-in-Time Counts						
	2014	2015	2016	2017	2018	2019
Total Homeless Count	560	549	551	506	559	506

Population	Estimate the # of persons experiencing homelessness on a given night	
	Sheltered	Unsheltered
Persons in Households with Adult(s) and Child(ren)	197	3
Persons in Households with Only Children	1	0
Persons in Households with Only Adults	288	17
Chronically Homeless Individuals	7	0
Chronically Homeless Families	0	0
Veterans	29	2
Unaccompanied Child	1	0
Persons with HIV	0	0

Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
2474	1911	1239	28

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	197	3	0	0	0	0
Persons in Households with Only Children	1	0	0	0	0	0
Persons in Households with Only Adults	288	17	0	0	0	0
Chronically Homeless Individuals	7	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	29	2		0	0	0
Unaccompanied Child	1	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	426	12
Black or African American	26	0
Asian	1	0
American Indian or Alaska Native	18	5
Pacific Islander	1	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	95	4
Not Hispanic	391	16

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

There were a total of 61 households with adults and children that were counted during the 2019 Point-in-Time count. These households included 200 persons, some 122 of which were children under the age of 18. There were 31 veterans counted in 2019, some two of which were unsheltered at the time of the count.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

A majority of those counted were considered white, while 26 persons were black, and one person was Asian. Some 23 persons counted were American Indian or Alaskan Native, and one was Pacific Islander. As for ethnicity, some 99 were Hispanic.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Out of the 506 persons counted during the 2019 Point-in-Time Count, only 20 were unsheltered. Some 244 were in an emergency shelter and 242 were in transitional housing. Adult only households were sheltered at a rate of 94.9 percent. Households with at least one child were sheltered at a rate of 98.4 percent.

Discussion:

The homeless population for the Balance of State CoC has remained steady between 2014 and 2019. As such, the need for housing and service options continues to be prevalent. In addition, the number of households in the area who are at risk of homelessness continue to be a high priority to keep the number of homeless households from increasing.

CDBG-DR

In addition to its review of unmet needs generated by the floods, the unmet needs assessment took into consideration pre-disaster homelessness as detailed in the Nebraska CDBG-DR Action Plan. To support services for these populations, the Affordable Housing Construction Program will incorporate opportunities that may provide benefit to households experiencing homelessness, as reflected in the program's scoring criteria.

Refer to CDBG-DR Action Plan for more information.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The following section describes the non-homeless special needs populations in the State of Nebraska Non-Entitlement. These non-homeless special needs population include the elderly, persons with disabilities, people with drug and alcohol addictions, victims of domestic violence, and persons with HIV/AIDS.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	2,143
Area incidence of AIDS	
Number of new cases prior year (3 years of data)	38
Rate per population	2
Rate per population (3 years of data)	1.7
Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	2,338
Area Prevalence (PLWH per population)	4.1
Number of new HIV cases reported last year	88

Table 26 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	754
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 27 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly

Table NA-45.1, presents the population of the State of Nebraska Non-Entitlement by age and gender from the 2010 Census and 2018 current census estimates. The elderly population grew at the fastest rate during this time period, by 14 percent.

Table NA-45 1 Population by Age and Gender State of Nebraska Non-Entitlement 2010 Census and Current Census Estimates							
Age	2010 Census			2018 Current Census Estimates			% Change 10-18
	Male	Female	Total	Male	Female	Total	
Under 14 years	196,204	187,338	383,542	204,445	194,345	398,790	4%
15 to 24 years	132,265	125,941	258,206	137,349	131,410	268,759	4.1%
25 to 44 years	124,976	120,200	245,176	131,965	123,758	255,723	4.3%
45 to 54 years	111,948	108,890	220,838	121,949	117,362	239,311	8.4%
55 to 64 years	129,381	129,345	258,726	111,151	108,820	219,971	-15%
65 and Over	105,119	108,057	213,176	119,990	123,058	243,048	14%
Total	906,296	920,045	1,826,341	963,382	965,886	1,929,268	5.6%
% of Total	49.6%	50.4%	.	49.9%	50.1%	.	

People with Disabilities

Disability by age, as estimated by the 2018 ACS, is shown in Table NA-45.2, below. The disability rate for females was 11.4 percent, compared to 12.4 percent for males. The disability rate grew precipitously higher with age, with 47.0 percent of those over 75 experiencing a disability.

Table NA-45 2 Disability by Age State of Nebraska Non-Entitlement 2018 Five-Year ACS Data						
Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	331	0.9%	315	0.9%	646	0.9%
5 to 17	5,548	5.6%	3,765	4.0%	9,313	4.8%
18 to 34	6,547	6.3%	5,178	5.0%	11,725	5.7%
35 to 64	23,148	11.6%	20,759	10.5%	43,907	11.1%
65 to 74	13,032	28.2%	10,042	20.7%	23,074	24.4%
75 or Older	15,628	50.1%	18,978	44.7%	34,606	47.0%
Total	64,234	12.4%	59,037	11.4%	123,271	11.9%

The number of disabilities by type, as estimated by the 2018 ACS, is shown in Table NA-45.3. Some 6 percent have an ambulatory disability, 4.5 have an independent living disability, and 1.9 percent have a self-care disability.

Table NA-45 3 Total Disabilities Tallied: Aged 5 and Older State of Nebraska Non-Entitlement 2018 Five-Year ACS		
Disability Type	Population with Disability	Percent with Disability
Hearing disability	45,767	4.4%
Vision disability	20,879	2.0%
Cognitive disability	38,656	4.0%
Ambulatory disability	58,088	6.0%
Self-Care disability	18,636	1.9%
Independent living disability	34,380	4.5%

People with Alcohol and Drug Addictions

The Nebraska Risk and Protective Factor Student Survey Results for 2018 found that 16 percent of 12th graders currently engage in binge drinking.² An estimated 12.5 percent currently use Marijuana, 7.7 have used LSD, and 3.6 have used cocaine. An estimated 0.9 percent have used meth, and 8.9 have misused prescription drugs.

According to the National Institute on Drug Abuse, in 2017, there were 8.1 drug overdose deaths per 100,000 persons.³ The majority of these deaths were due to opioids.

Victims of Domestic Violence

Pinpointing specific numbers of domestic violence victims is difficult due to the lack of reporting and other mitigating factors. According to the Nebraska Coalition to End Sexual and Domestic Abuse, they were served 17,300 persons in 2017. This included 11,565 adult females, 1,308 adult males, and 3,904 children and youth.⁴

What are the housing and supportive service needs of these populations and how are these needs determined?

The Housing and Community Development Survey found that At-Risk Youth aging out of the foster system, persons with severe mental illness, and at-risk youth had the highest rated needs. This was followed by the elderly, persons with substance use addictions, and those at-risk for homelessness. These results are shown in Table NA-45.4.

² https://ecdhd.ne.gov/file_download/inline/87f5679c-612f-4f4b-b892-ec3e61d80ef1

³ <https://www.drugabuse.gov/opioid-summaries-by-state/nebraska-opioid-summary>

⁴ http://dhhs.ne.gov/WHI%20Docs/WHI_Trends_SexualAssault.pdf

Table NA-45.4
Providing a Suitable Living Environment
 State of Nebraska
 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Please rate the need for SERVICES AND FACILITIES for each of the following special needs groups in Nebraska.						
At-Risk Youth aging out of the foster system	9	79	178	343	376	985
Persons with severe mental illness	6	69	195	337	378	985
At-Risk Youth	8	77	215	309	376	985
The elderly (age 85+)	9	67	240	286	383	985
Persons with substance use addictions	10	90	225	284	376	985
At-Risk for Homelessness	16	118	191	283	377	985
Homeless persons	16	128	186	279	376	985
Veterans	5	98	227	275	380	985
Persons with intellectual or developmental disabilities	4	94	249	260	378	985
Victims/survivors of domestic violence or sexual assault	8	107	242	251	377	985
Persons with physical disabilities	3	91	271	241	379	985
Persons with physical disabilities	3	91	271	241	379	985
Persons recently released from incarceration	22	150	201	234	378	985
The elderly (age 62+)	6	96	282	219	382	985
Persons with HIV/AIDS	40	261	196	101	387	985
Other	32	5	8	21	919	985

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the State of Nebraska's 2017 HIV Surveillance Report, there were 88 new HIV infections diagnosed in 2017⁵. There are 2,338 persons living with HIV/AIDS in the State. Some 77 percent of the current HIV/AIDS population in the State are white, five percent are black, five percent are "other" race, and 11 percent are Hispanic. Males account for 75 percent of new diagnoses each year. People aged 25 to 44 accounted for a majority of new HIV diagnoses over the past ten years in the State.

Discussion:

The special needs populations in the non-entitlement areas of Nebraska include the elderly and frail elderly, which are growing at the fastest rate of any age group in the area. It also includes persons with disabilities, which account for 11.8 percent of the population and 46.9 percent of those aged 75 and older. In addition, there are other special needs population, such as veterans, persons with alcohol and drug abuse disorders, victims of domestic violence, and persons with HIV/AIDS that are in need of services in the State.

⁵ <http://dhhs.ne.gov/Reports/HIV%20AIDS%20Epidemiologic%20Profile%20UPDATE%20-%202017.pdf>

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The highest rated needs, according to the Housing and Community Development Survey, are for childcare facilities, demolition of dilapidated structures, and youth centers.

Table NA-50.1 Providing a Suitable Living Environment State of Nebraska Housing and Community Development Survey						
Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Please rate the need for the following COMMUNITY AND PUBLIC FACILITIES in Nebraska:						
Childcare facilities	5	64	176	374	366	985
Demolition of Dilapidated Structures	17	140	182	282	364	985
Youth centers	8	97	268	256	356	985
Community centers	12	132	232	247	362	985
Residential treatment centers	15	154	223	225	368	985
Senior centers	17	146	258	201	363	985
Recycling Centers/Services	25	163	227	201	369	985
Healthcare facilities	23	169	245	186	362	985
Parks and recreational centers	22	157	269	178	359	985
Public buildings with improved accessibility	24	207	238	149	367	985
Cultural and Arts Centers	49	202	229	141	364	985
Libraries and learning centers	44	195	246	135	365	985
Public Safety (Fire Stations)	50	256	209	96	374	985

How were these needs determined?

These needs were determined by the Housing and Community Development Survey.

Describe the jurisdiction’s need for Public Improvements:

The top rated needs for infrastructure activities include street and road improvements, broadband/ internet services, and sidewalk improvements.

Table NA-50.2 Providing a Suitable Living Environment State of Nebraska Housing and Community Development Survey						
Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Please rate the need for the following INFRASTRUCTURE activities:						
Street and road improvements	2	50	224	358	351	985
Broadband/ Internet Services	26	108	184	305	362	985
Sidewalk improvements	7	115	246	263	354	985
Flood drainage improvements	20	115	236	246	368	985
ADA Improvements, such as sidewalk improvements, ramps, etc.	21	146	233	224	361	985
Bridge improvements	26	130	240	222	367	985
Bicycle and walking paths	39	183	191	212	360	985
Sewer system improvements	21	209	226	161	368	985
Storm sewer system improvements	20	179	260	154	372	985
Water system capacity improvements	19	201	251	141	373	985
Water quality improvements	34	230	218	137	366	985
Solid waste facility improvements	30	230	229	121	375	985
Other	36	2	3	18	926	985

How were these needs determined?

These needs were determined by the Housing and Community Development Survey.

Describe the jurisdiction’s need for Public Services:

The highest rated needs for public services include mental health care services, childcare services, and chemical dependency services. This was followed by transportation services, youth services, and homeless/at-risk services.

How were these needs determined?

These needs were determined by the Housing and Community Development Survey.

Table NA-50.3 Providing a Suitable Living Environment State of Nebraska Housing and Community Development Survey						
Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Please rate the need for the following HUMAN AND PUBLIC SERVICES in Nebraska.						
Mental health care services	5	49	164	406	361	985
Childcare services	7	71	174	372	361	985
Chemical dependency services	12	77	191	340	365	985
Transportation services	8	89	191	336	361	985
Youth services	4	55	247	317	362	985
Homeless/At Risk Services	24	126	191	285	359	985
Fair housing activities	22	116	210	273	364	985
Senior services	9	83	258	272	363	985
Fair housing education	30	115	210	265	365	985
Tenant/Landlord counseling	22	120	215	265	363	985
Home buyer education	11	116	234	261	363	985
Veteran Services	10	110	244	259	362	985
Healthcare services	13	123	247	237	365	985
Employment services	11	107	261	237	369	985
Legal Services	20	143	241	214	367	985
Translation Services	25	181	228	183	368	985
Crime awareness education	29	193	251	139	373	985
Mitigation of radon hazards	45	202	231	138	369	985
Mitigation of asbestos hazards	40	233	215	123	374	985
Mitigation of lead-based paint hazards	49	244	201	117	374	985
Other	34	6	8	21	916	985

CDBG-DR Infrastructure Needs

As outlined in detail in the CDBG-DR Action Plan, the disaster (DR-4420) generated catastrophic impacts to infrastructure, resulting in significantly higher losses in that category than economic and housing needs. Infrastructure damage was widespread, with 84 out of 93 counties impacted, reporting damage to roads, bridges, levees, dams, and many other critical infrastructure facilities. To address the extensive infrastructure needs within the state, the state is prioritizing CDBG-DR funding under DR-4420 for infrastructure recovery, including infrastructure in support of housing.

According to published studies, disaster-impacted areas experience an increase to the cost of construction. This can be attributed to concentrated demand for contractors and building supplies. The ongoing ripple of the covid-19 pandemic has exacerbated these issues.

Refer to the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

CDBG-DR Economic Development Needs

While the CDBG-DR Action Plan acknowledges unmet economic revitalization needs, it does not allocate funding for these needs due to a subsequent injection of financial support for the private sector (COVID-19 relief). Upon preliminary review of applications for COVID-19 related funding, it was apparent that the economic needs attributed to that event, along with available economic recovery resources, were much more significant than those attributed to the 2019 disasters. Furthermore, these mitigating factors make it increasingly difficult to draw the necessary nexus between needs and the 2019 disaster.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Between 2010 and 2018, the number of housing units in the non-entitlement areas increased by 2.4 percent. The housing market has seen a decrease in single-family housing production in recent years, but an uptick in multifamily production. Meanwhile, housing costs have continued to rise. The non-entitlement areas have seen a slight increase in the number of vacant units between 2010 and 2018, with an increase in the proportion of “other” vacant units.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Table MA-10.1, shows housing units by type in 2010 and 2018. In 2010, there were 461,627 housing units, compared with 472,607 in 2018. Single-family units accounted for 82.8 percent of units in 2018, compared to 82.6 in 2010. Apartment units accounted for 8.2 percent in 2018, compared to 7.5 percent in 2010.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	587,660	73%
1-unit, attached structure	31,260	4%
2-4 units	36,651	5%
5-19 units	72,165	9%
20 or more units	52,743	7%
Mobile Home, boat, RV, van, etc.	29,332	4%
Total	809,811	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Table MA-10 1 Housing Units by Type State of Nebraska Non-Entitlement 2010 & 2018 Five-Year ACS Data				
Unit Type	2010 Five-Year ACS		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	381,288	82.6%	391,108	82.8%
Duplex	7,627	1.7%	7,845	1.7%
Tri- or Four-Plex	11,787	2.6%	11,680	2.5%
Apartment	34,837	7.5%	38,530	8.2%
Mobile Home	26,015	5.6%	23,268	4.9%
Boat, RV, Van, Etc.	73	0%	176	0.0%
Total	461,627	100%	472,607	100.0%

Table MA-10.2 shows housing units by tenure from 2010 to 2018. By 2018, there were 472,607 housing units. An estimated 72.6 percent were owner-occupied, and 11.3 percent were vacant.

Table MA-10 2				
Housing Units by Tenure				
State of Nebraska Non-Entitlement				
2010 Census & 2018 Five-Year ACS Data				
Tenure	2010 Census		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	417,489	89.1%	419,264	88.7%
Owner-Occupied	305,286	73.1%	304,269	72.6%
Renter-Occupied	112,203	26.9%	114,995	27.4%
Vacant Housing Units	51,223	10.9%	53,343	11.3%
Total Housing Units	468,712	100%	472,607	100.0%

The distribution of unit types by race are shown in Table MA-10.3. An estimated 85.1 percent of white households occupy single-family homes, while 46.7 percent of black households do. Some 7.6 percent of white households occupied apartments, while 35.8 percent of black households do. An estimated 73.6 percent of Asian, and 65.6 percent of American Indian households occupy single-family homes.

Table MA-10 3							
Distribution of Units in Structure by Race							
State of Nebraska Non-Entitlement							
2018 Five-Year ACS Data							
Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	85.1%	46.7%	65.6%	73.6%	73.8%	71.1%	78.0%
Duplex	1.5%	4.8%	3.9%	3.6%	0.0%	2.6%	1.7%
Tri- or Four-Plex	2.2%	10.3%	5.5%	4.0%	4.2%	5.1%	2.4%
Apartment	7.6%	35.8%	15.5%	15.9%	22.0%	4.7%	12.8%
Mobile Home	3.6%	2.2%	9.5%	2.9%	0.0%	16.5%	4.9%
Boat, RV, Van, Etc.	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Table MA-10.4 shows households by year home built for the 2010 and 2018 5-year ACS data. Housing units built between 2000 and 2009, account for 12.5 percent of households in 2010 and 14.4 percent of households in 2018. Housing units built in 1939 or earlier represented 22.8 percent of households in 2018 and 25.8 percent of households in 2010.

Table MA-10 4 Households by Year Home Built State of Nebraska Non-Entitlement 2010 & 2018 Five-Year ACS Data				
Year Built	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	105,430	25.8%	95,411	22.8%
1940 to 1949	24,118	5.9%	22,611	5.4%
1950 to 1959	36,521	8.9%	34,497	8.2%
1960 to 1969	39,462	9.6%	39,961	9.5%
1970 to 1979	68,023	16.6%	66,449	15.8%
1980 to 1989	36,133	8.8%	34,340	8.2%
1990 to 1999	48,558	11.9%	43,739	10.4%
2000 to 2009	50,988	12.5%	60,315	14.4%
2010 or Later	.	.	21,941	5.2%
Total	409,233	100%	419,264	100.0%

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	630	0%	9,019	4%
1 bedroom	9,565	2%	69,529	28%
2 bedrooms	93,494	19%	94,122	38%
3 or more bedrooms	384,259	79%	75,995	31%
Total	487,948	100%	248,665	101%

Table 29 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Programs will target households that have housing problems in the State of Nebraska Non-Entitlement. This includes over 91,000 households in the non-entitlement area of the State, some 51,815 of which are owner households, and 36,965 of which are renter households. Of these, an estimated 76,000 are low to moderate income households.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Map MA-10.1 shows the number of Section 8 contracts that are set to expire. In the range of this Consolidated Plan, there are numerous contracts that are set to expire over the next five years.

Does the availability of housing units meet the needs of the population?

As seen in the Needs Assessment section, as well as information gathered from public input, current housing does not meet the needs of the population. This is seen most readily in the rate of cost burdens in the non-entitlement areas of the State, especially for lower income households. Renter households are more likely to be impacted by cost burdens, and are therefore most likely to not have housing units that meet their needs.

Table MA-10 5
Housing Problems by Income and Tenure
 State of Nebraska Non-Entitlement
 2012–2016 HUD CHAS Data

Housing Problem	\$0 to \$23,430	\$23,431 to \$39,050	\$39,051 to \$62,480	\$62,481 to \$78,100	Above \$78,100	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	265	155	245	161	571	1,397
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	26	136	120	66	145	493
Overcrowded - With 11-1.5 people per room (and none of the above problems)	155	425	830	385	680	2,475
Housing cost burden greater than 50% of income (and none of the above problems)	8,545	4,510	2,580	605	510	16,750
Housing cost burden greater than 30% of income (and none of the above problems)	4,320	6,975	9,990	4,215	5,200	30,700
Zero/negative income (and none of the above problems)	1,605	0	0	0	0	1,605
Has none of the 4 housing problems	3,575	14,030	35,930	30,670	166,205	250,410
Total	18,491	26,231	49,695	36,102	173,311	303,830
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	1,250	900	750	231	530	3,661
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	150	125	255	120	75	725
Overcrowded - With 11-1.5 people per room (and none of the above problems)	670	490	845	385	380	2,770
Housing cost burden greater than 50% of income (and none of the above problems)	11,480	2,205	385	100	45	14,215
Housing cost burden greater than 30% of income (and none of the above problems)	4,225	9,230	4,165	450	205	18,275
Zero/negative income (and none of the above problems)	1,295	0	0	0	0	1,295
Has none of the 4 housing problems	5,450	8,805	21,600	13,085	24,955	73,895
Total	24,520	21,755	28,000	14,371	26,190	114,836
Total						
Lacking complete plumbing or kitchen facilities	1,515	1,055	995	392	1,101	5,058
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	176	261	375	186	220	1,218
Overcrowded - With 11-1.5 people per room (and none of the above problems)	825	915	1,675	770	1,060	5,245
Housing cost burden greater than 50% of income (and none of the above problems)	20,025	6,715	2,965	705	555	30,965
Housing cost burden greater than 30% of income (and none of the above problems)	8,545	16,205	14,155	4,665	5,405	48,975
Zero/negative income (and none of the above problems)	2,900	0	0	0	0	2,900
Has none of the 4 housing problems	9,025	22,835	57,530	43,755	191,160	324,305
Total	43,011	47,986	77,695	50,473	199,501	418,666

Describe the need for specific types of housing:

Table MA-10.7, shows the results of the Housing and Community Development Survey as it rated various housing needs. The top-rated needs for housing include construction of new affordable single family homes for sale, construction of new affordable single family homes for rent, and first-time home-buyer assistance. This was followed by homeowner housing rehabilitation, construction of new affordable multi-family homes for rent, and rental housing rehabilitation.

Table MA-10.7 Providing Decent and Affordable Housing State of Nebraska Housing and Community Development Survey						
Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Please rate the need for the following HOUSING activities in the state:						
Construction of new affordable single family homes, for sale	10	64	166	469	276	985
Construction of new affordable single family homes, for rent	20	74	184	421	286	985
First-time home-buyer assistance	6	72	225	396	286	985
Homeowner housing rehabilitation	11	73	231	389	281	985
Construction of new affordable multi-family homes, for rent	19	106	189	385	286	985
Rental housing rehabilitation	23	89	210	376	287	985
Rental housing for very low-income households	25	102	204	372	282	985
Energy Efficiency Improvements	11	69	275	349	281	985
Senior-friendly housing	12	82	265	347	279	985
Workforce Housing for Single Family, For Rent	24	97	236	341	287	985
Rental assistance	20	104	235	339	287	985
Workforce Housing for Single Family, For Sale	24	104	236	333	288	985
Updating existing housing to meet seniors' needs	11	95	265	328	286	985
Supportive housing for people who are homeless or disabled	21	146	214	317	287	985
Preservation of federal subsidized housing	32	141	241	284	287	985
Workforce Housing for Multi-Family, For Rent	27	143	239	282	294	985
Construction of new affordable multi-family homes, for sale	25	159	236	278	287	985
Market Rate Housing for Single Family, For Sale	36	143	259	259	288	985
Homeownership in communities of color	51	166	228	240	300	985
Market Rate Housing Single Family, For Rent	38	167	257	234	289	985
Housing demolition	31	217	215	233	289	985
Mixed income housing	31	181	266	220	287	985
Market Rate Housing Multi-Family, For Rent	42	186	255	204	298	985
Accessory Dwelling Units (such as a mother-in-law apartment or tiny home)	108	253	174	145	305	985
Mixed use housing (such as first floor stores or restaurants and upper floors apartments)	87	278	214	120	286	985
Single Room Occupancy Units	92	293	186	118	296	985
Downtown housing	80	273	217	114	301	985
Other	68	20	19	47	831	985

Discussion

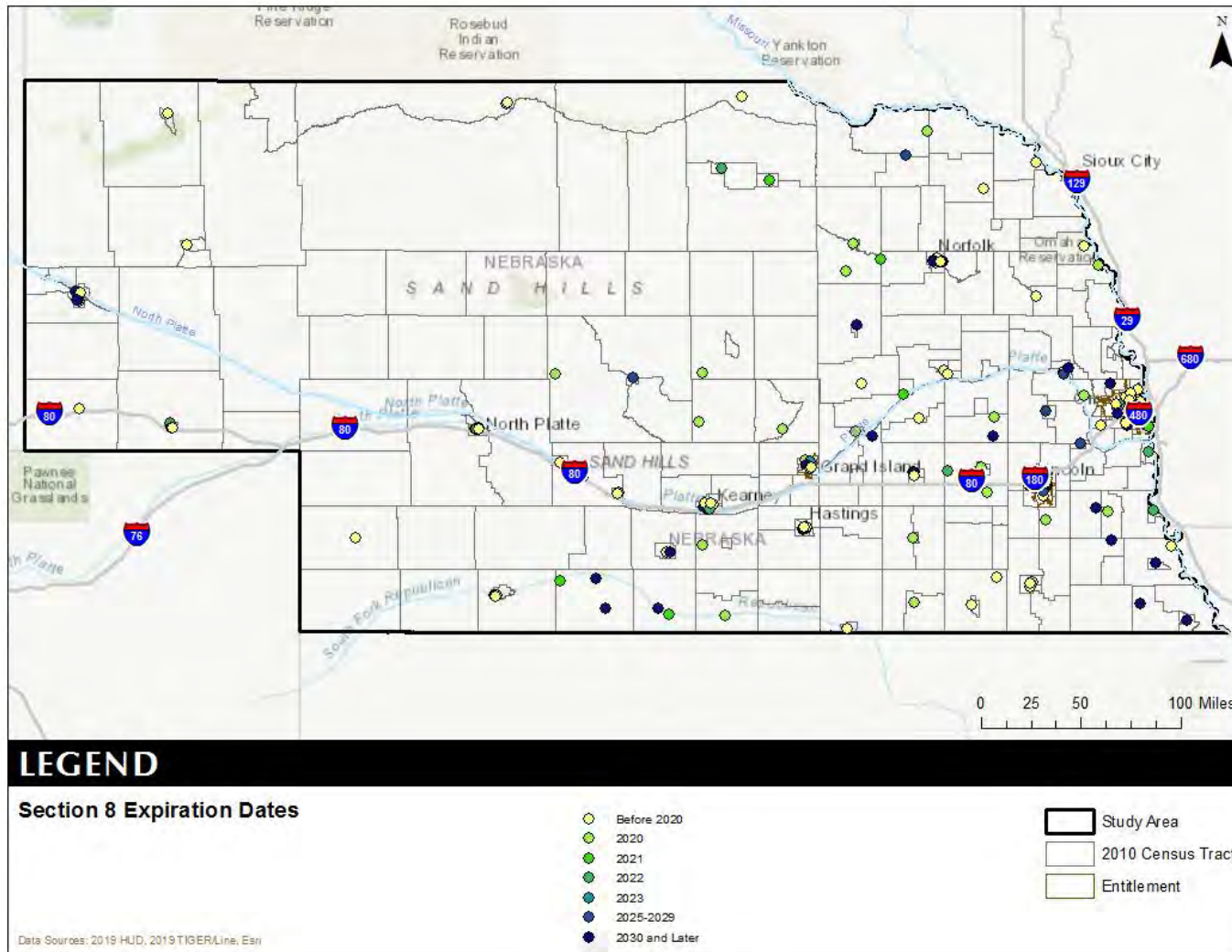
The current housing stock may not be meeting the needs of the population in the non-entitlement area of the State, especially those in lower income levels. While the rate and type of market housing production, as described in the following section, may be providing additional housing options, they may not be meeting the needs of a large proportion of households in the State.

CDBG-DR

As outlined in detail in the Nebraska CDBG-DR Action Plan, the State has undertaken significant recovery efforts to identify the number of housing units impacted.

Refer to the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

Map MA-10.1 Expiring Section 8 Contracts State of Nebraska Non-Entitlement 2018 HUD, Tigerline



MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	119,700	133,200	11%
Median Contract Rent	503	585	16%

Table 30 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Housing Production

The Census Bureau reports building permit authorizations and “per unit” valuation of building permits by county annually. Single-family construction usually represents most residential development in the county. Single-family building permit authorizations in the State of Nebraska Non-Entitlement decreased from 2,644 authorizations in 2017 to 2,591 authorizations in 2018.

The real value of single-family building permits increased from 245,231 dollars in 2017 to 249,388 dollars in 2018. This compares to an increase in permit value statewide, with values rising from 245,231 dollars in 2017 to 249,388 dollars in 2018.

The concentration of homeowner households are shown in Map MA-15.1. The highest rates of homeownership were seen outside the larger cities of Omaha and Lincoln, with some areas exceeding 91.4 percent homeownership rates. In some of the western and more rural areas of the State, homeownership rates were lower than 73.1 percent. Renter concentrations were spread throughout the non-entitlement areas of the State. This is shown in Map MA-15.2.

Median home values and median contract rents were both highest in the areas adjacent to the more urban areas in the State. The median home value exceeded \$175,600 in these higher cost areas. They were lowest, below \$86,900, in the central and rural parts of the State. A similar pattern was true for median contract rents.

Table MA-15 1
Building Permits and Valuation
 State of Nebraska Non-Entitlement
 Census Bureau Data, 1980–2018

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	2,670	132	186	681	3,669	102,310	52,401
1981	1,558	90	117	257	2,022	119,134	43,531
1982	1,518	60	136	254	1,968	110,302	53,217
1983	1,897	106	111	222	2,336	106,050	55,785
1984	1,618	80	82	294	2,074	110,946	53,903
1985	1,125	72	81	308	1,586	108,603	45,375
1986	1,088	50	43	299	1,480	105,831	48,862
1987	1,133	50	11	244	1,438	106,638	54,487
1988	1,207	42	68	554	1,871	105,604	41,930
1989	1,368	70	70	423	1,931	103,706	39,475
1990	1,509	54	44	474	2,081	108,283	54,852
1991	1,797	102	50	591	2,540	110,996	60,563
1992	2,136	108	49	692	2,985	122,137	42,141
1993	2,419	118	150	764	3,451	132,002	51,593
1994	2,675	198	138	991	4,002	136,384	52,262
1995	2,525	140	80	868	3,613	134,352	53,282
1996	2,747	204	58	625	3,634	140,379	57,520
1997	2,686	242	51	961	3,940	138,149	61,190
1998	2,851	154	112	806	3,923	146,596	56,051
1999	3,050	130	32	481	3,693	159,541	70,492
2000	2,837	114	50	958	3,959	157,626	61,686
2001	2,683	74	33	597	3,387	164,968	57,122
2002	3,134	110	58	444	3,746	170,933	80,078
2003	3,740	170	42	552	4,504	178,728	84,460
2004	4,254	194	39	753	5,240	182,220	78,008
2005	4,143	84	30	204	4,461	182,670	62,789
2006	3,302	88	21	177	3,588	191,620	69,645
2007	2,706	92	33	114	2,945	190,174	64,172
2008	2,160	48	4	242	2,454	204,814	99,781
2009	1,952	68	22	70	2,112	208,827	63,179
2010	1,914	126	140	618	2,798	211,224	71,316
2011	1,783	118	38	352	2,291	218,994	69,383
2012	2,127	90	59	243	2,519	222,672	80,705
2013	2,534	74	17	650	3,275	234,703	80,953
2014	2,375	104	18	304	2,801	239,460	92,385
2015	2,543	124	24	75	2,766	241,212	77,945
2016	2,490	94	37	299	2,920	252,896	95,672
2017	2,644	150	99	164	3,057	245,231	80,891
2018	2,591	130	49	432	3,202	249,388	60,384

Rent Paid	Number	%
Less than \$500	99,498	40%
\$500-999	123,936	49.8%
\$1,000-1,499	19,096	7.7%
\$1,500-1,999	2,623	1.1%
\$2,000 or more	3,512	1.4%
Total	248,665	100%

Table 31 - Rent Paid

Data Source: 2011-2015 ACS

Diagram MA-15.1 Single-Family Permits

State of Nebraska Non-Entitlement
Census Bureau Data, 1980–2018

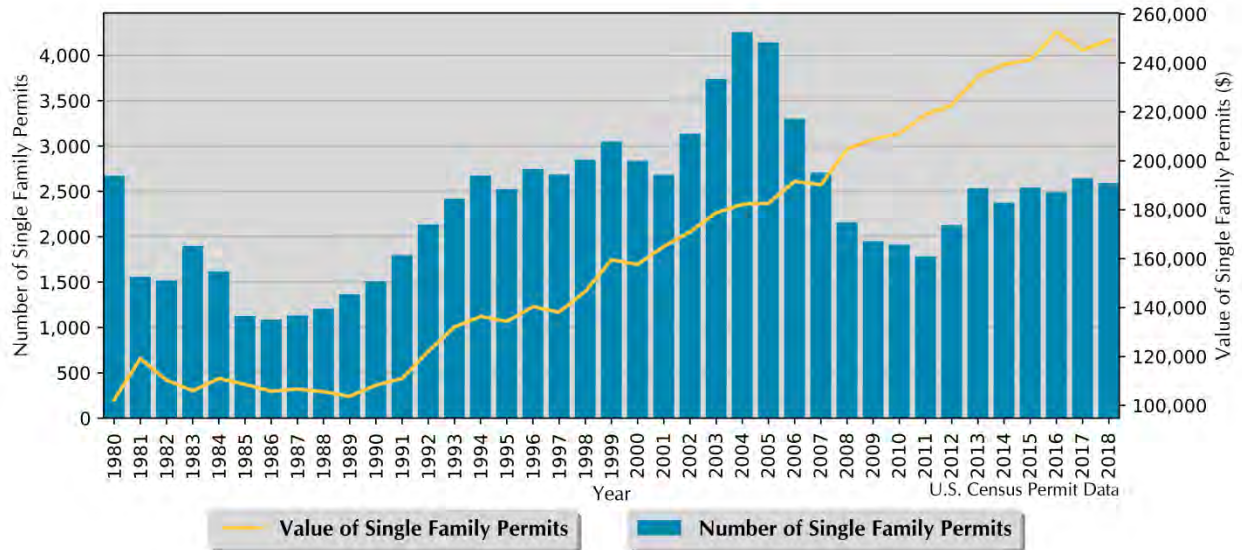
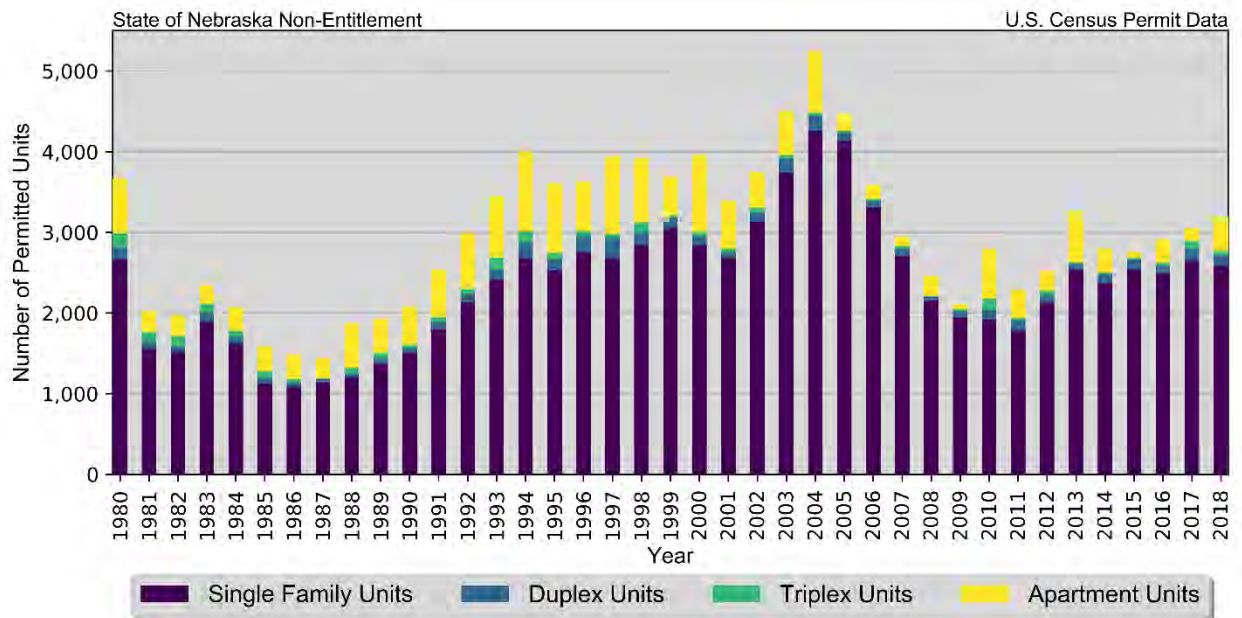
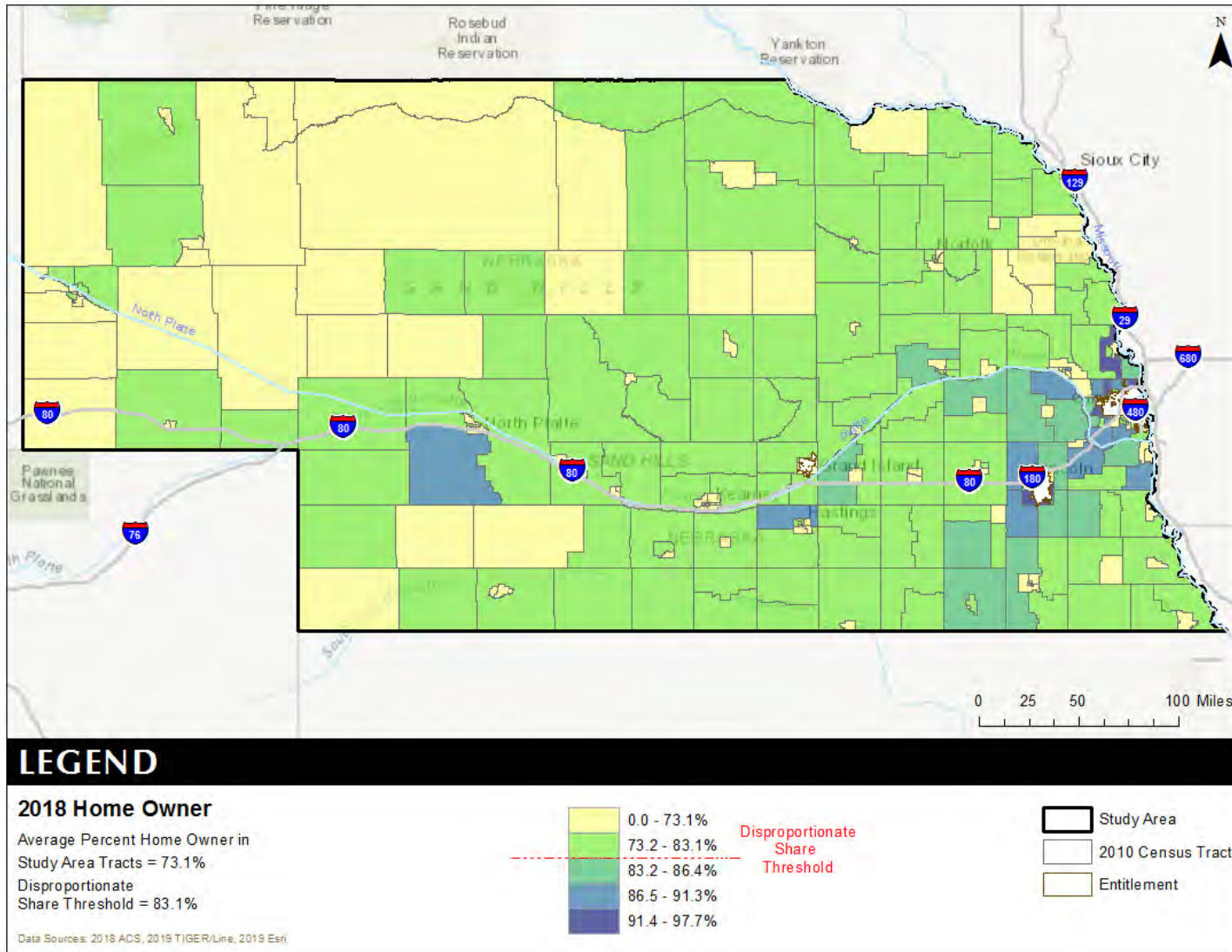


Diagram MA-15.2 Total Permits by Unit Type

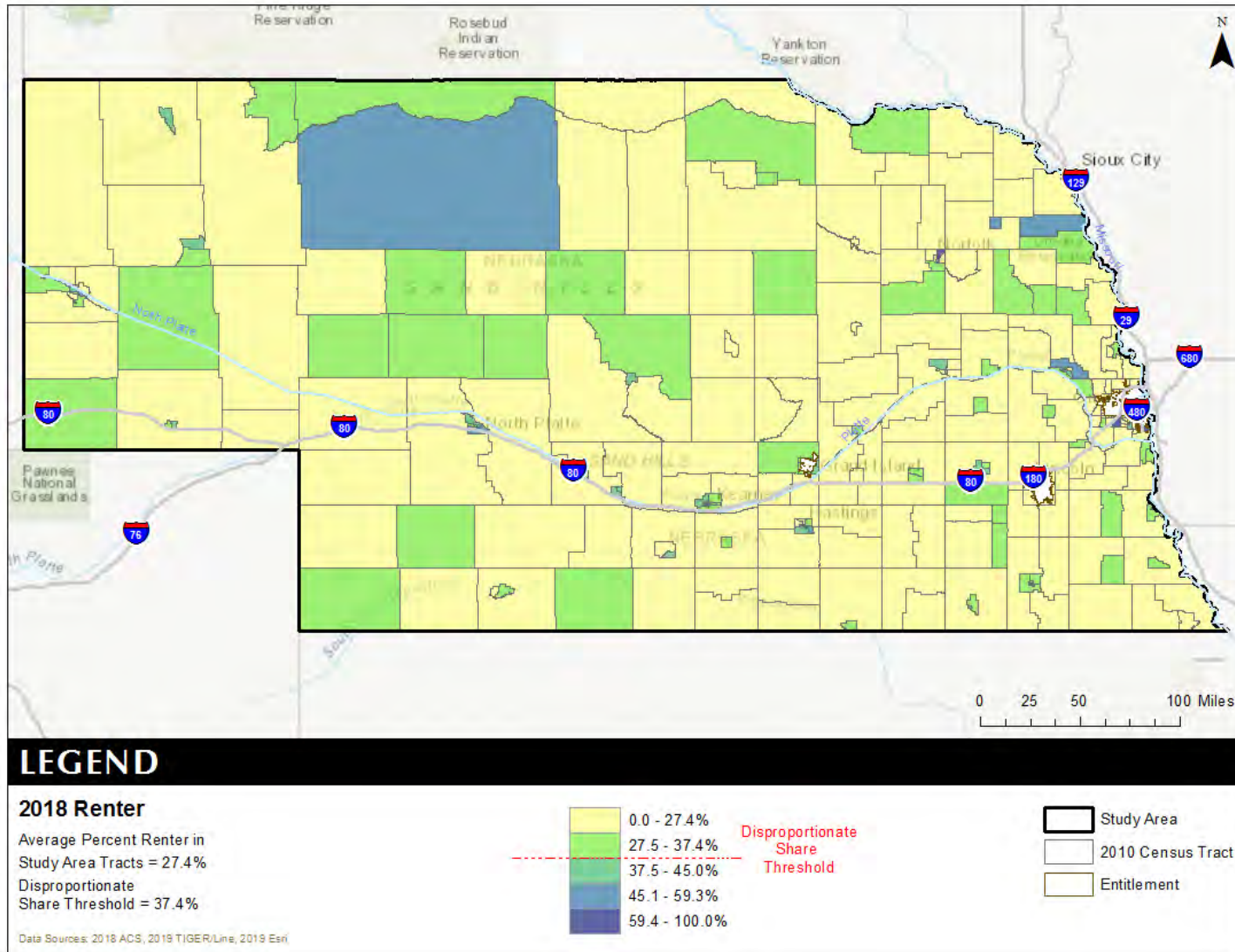
State of Nebraska Non-Entitlement
Census Bureau Data, 1980–2018



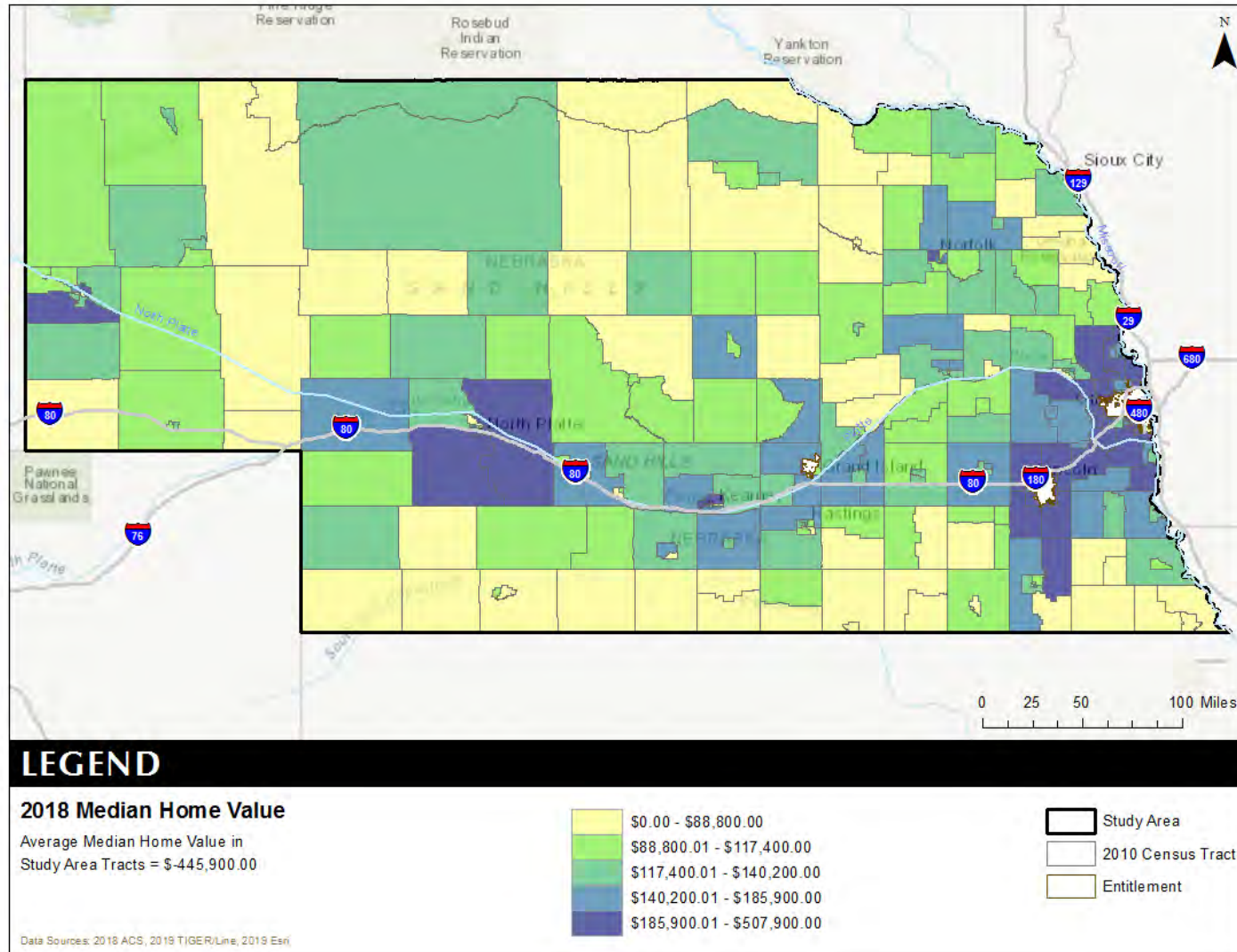
Map MA-15.1
2018 Homeowner Households
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



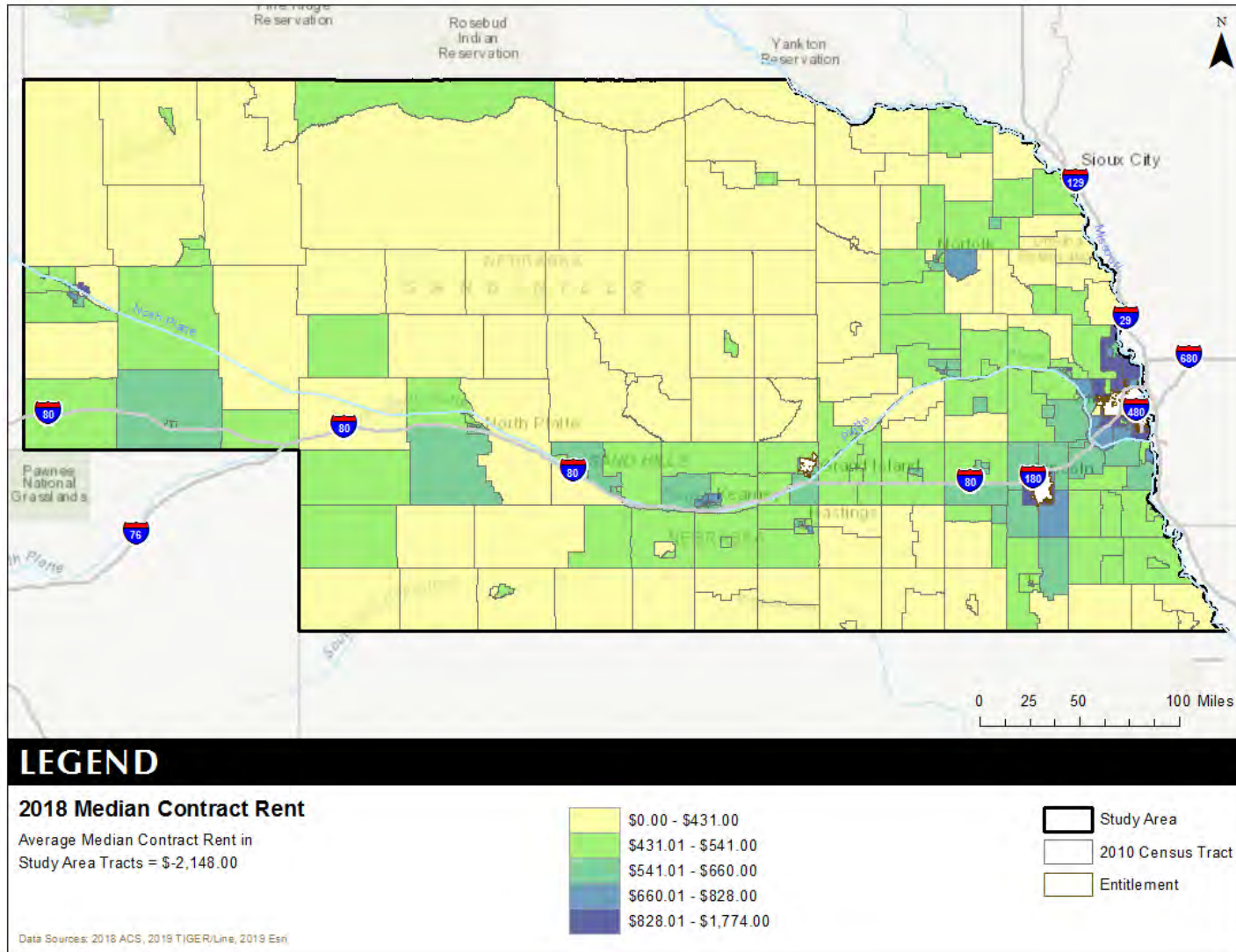
Map MA-15.2
2018 Renter Households
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Map MA-15.3
2018 Median Home Value
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Map MA-15.4
2018 Median Contract Rent
State of Nebraska Non-Entitlement
2018 ACS, Tigerline



Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	22,150	No Data
50% HAMFI	92,540	55,325
80% HAMFI	174,975	140,705
100% HAMFI	No Data	200,345
Total	289,665	396,375

Table 32 – Housing Affordability

Data Source: 2011-2015 CHAS

Is there sufficient housing for households at all income levels?

As demonstrated by the housing needs and cost burden sections in the Needs Assessment, there is a significant amount of the population that faces housing challenges. Low income households are particularly prone to facing cost burdens. This points to the fact that there is not sufficient housing options for all households, especially those at lower income levels. Additionally, public input comments indicated there is a significant need for affordable housing options for lower income households.

How is affordability of housing likely to change considering changes to home values and/or rents?

The State of Nebraska Non-Entitlement saw a significant increase in housing prices in recent years. If trends continue, the area will see increasing rent and home values. This would lead to additional households facing cost burdens.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

There are no statewide HOME and Fair Market Rents. However, the State utilizes county HOME and Fair Market Rents. The Fair Market Rent (FMR) and HOME rents may not be sufficient to meet the housing needs of households in the State. This may be especially true for larger families that require larger units.

Discussion

The cost of housing in the non-entitlement areas continues to be out of reach for many low to moderate income households. This is reflected in the proportion of lower income households facing cost burdens and other housing problems. It is anticipated that housing cost burdens will continue to be a major factor for many households in the area and demonstrates the need for additional affordable housing options.

CDBG-DR

The Nebraska CDBG-DR Action Plan Impact and Unmet Needs Assessment neither addresses nor calculates the cost of housing. However, according to published studies, disaster-impacted areas experience an increase to the cost of housing. This can be attributed to the loss of and damages to surviving housing stock, both of which also contribute to concentrated demand for contractors and building supplies – driving up prices for all facets of the housing market. The ongoing ripple of the covid-19 pandemic has exacerbated these issues.

Refer to the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The following section will describe the condition of housing in the State of Nebraska Non-Entitlement.

Definitions

Substandard Condition: no major structural defects, adequate plumbing facilities and an appearance which does not create a blighting influence.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition is both financially and structurally feasible for rehabilitation.

The definition of substandard but suitable for rehabilitation may also include a quantifiable standard such as a dwelling in which the deficiencies are limited in number and magnitude such that the cost of rehabilitation would not exceed 50% of the replacement cost of the dwelling.

Examples of minor repairs may include disability access, lead-based paint remediation, foundation repair, wall repair, window/ door replacements, electrical repair, and/ or roof repair.

A property may be considered in “substandard condition but not suitable for rehabilitation” if it is dilapidated or deteriorated beyond feasible economic repair, or rehabilitation will exceed 50% of the replacement cost of the dwelling.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	88,776	18%	95,474	38%
With two selected Conditions	2,287	0%	7,507	3%
With three selected Conditions	184	0%	218	0%
With four selected Conditions	12	0%	0	0%
No selected Conditions	396,689	81%	145,466	59%
Total	487,948	99%	248,665	100%

Table 34 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	76,576	16%	31,135	13%
1980-1999	100,201	21%	58,844	24%
1950-1979	182,888	37%	97,840	39%
Before 1950	128,283	26%	60,846	24%
Total	487,948	100%	248,665	100%

Table 35 – Year Unit Built

Data Source: 2011-2015 CHAS

Table MA-20.1 shows households by year home built for the 2010 and 2018 5-year ACS data. Housing units built between 2000 and 2009, account for 12.5 percent of households in 2010 and 14.4 percent of households in 2018. Housing units built in 1939 or earlier represented 22.8 percent of households in 2018 and 25.8 percent of households in 2010.

Table MA-20 1 Households by Year Home Built State of Nebraska Non-Entitlement 2010 & 2018 Five-Year ACS Data				
Year Built	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	105,430	25.8%	95,411	22.8%
1940 to 1949	24,118	5.9%	22,611	5.4%
1950 to 1959	36,521	8.9%	34,497	8.2%
1960 to 1969	39,462	9.6%	39,961	9.5%
1970 to 1979	68,023	16.6%	66,449	15.8%
1980 to 1989	36,133	8.8%	34,340	8.2%
1990 to 1999	48,558	11.9%	43,739	10.4%
2000 to 2009	50,988	12.5%	60,315	14.4%
2010 or Later	.	.	21,941	5.2%
Total	409,233	100%	419,264	100.0%

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	311,171	64%	158,686	64%
Housing Units build before 1980 with children present	49,480	10%	34,075	14%

Table 36 – Risk of Lead-Based Paint

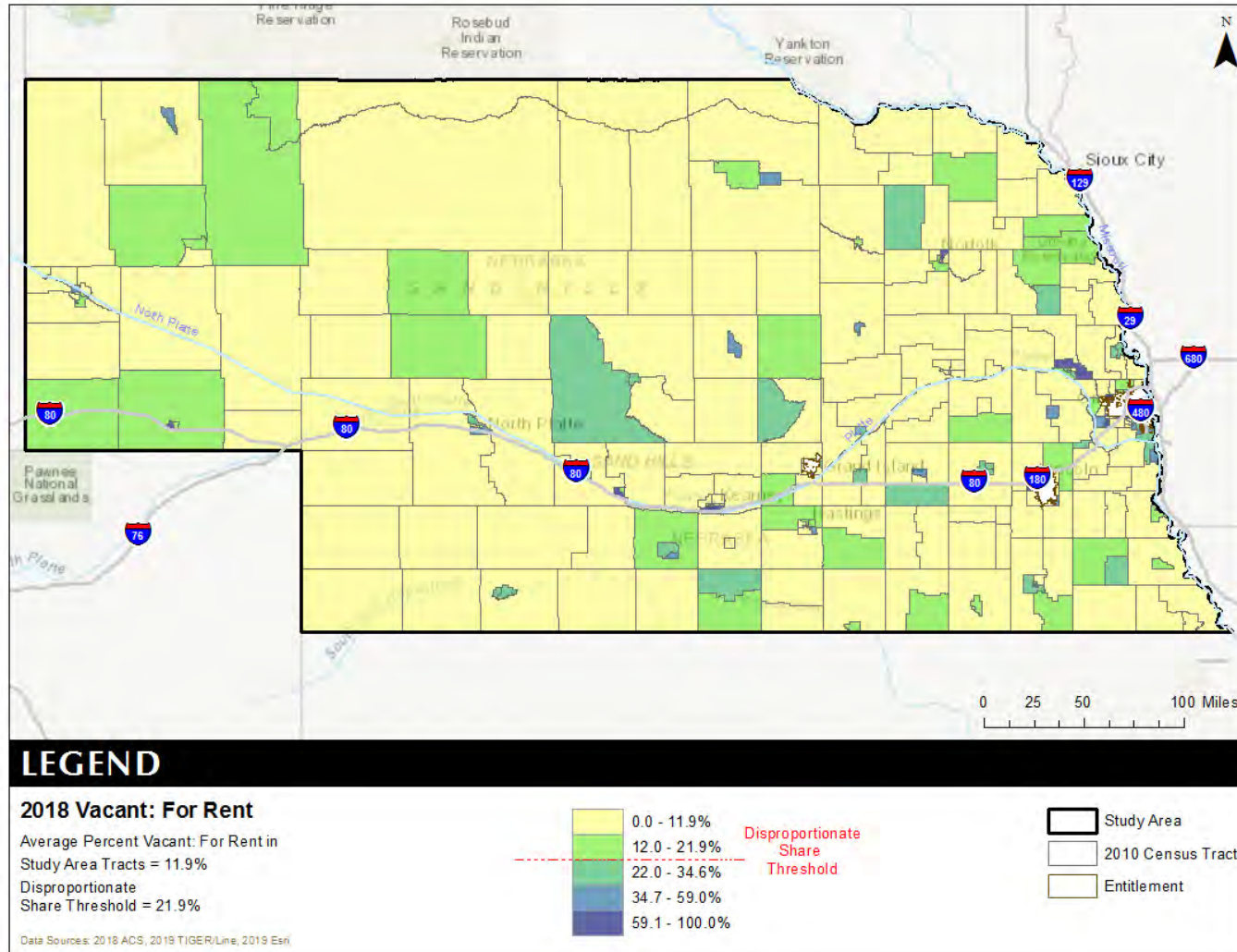
Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

By 2018, for rent units accounted for 11.9 percent of vacant units, while for sale units accounted for 6.5 percent. “Other” vacant units accounted for 47.4 percent of vacant units, representing a total of 25,260 “other” vacant units.

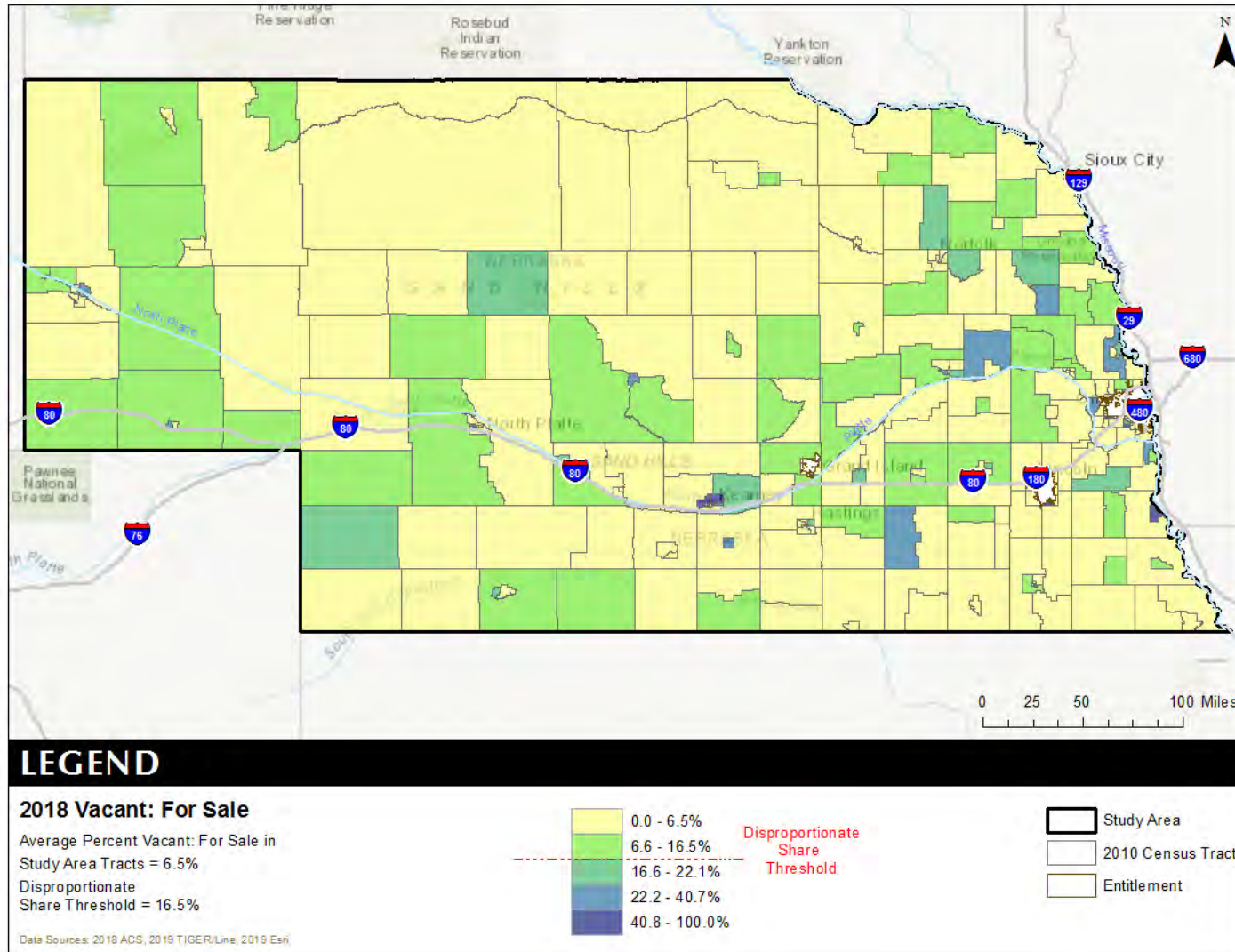
Table MA-20 3				
Disposition of Vacant Housing Units				
State of Nebraska Non-Entitlement				
2010 Census & 2018 Five-Year ACS Data				
Disposition	2010 Census		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	11,763	23%	6,362	11.9%
For Sale	5,638	11%	3,482	6.5%
Rented Not Occupied	689	1.3%	1,130	2.1%
Sold Not Occupied	1,970	3.8%	1,954	3.7%
For Seasonal, Recreational, or Occasional Use	12,785	25%	15,030	28.2%
For Migrant Workers	54	0.1%	125	0.2%
Other Vacant	18,324	35.8%	25,260	47.4%
Total	51,223	100%	53,343	100.0%

Map MA-20.1 shows the concentration of vacant units for rent, according to 2018 American Community Survey (ACS) data. While there were pockets of these units in various parts of the state, there tended to be more in the eastern part of Nebraska. The same was true for vacant for sale units, as seen in Map MA-20.2. “Other” vacant units are shown for both 2010 and 2018. The concentration of these units shifted somewhat between 2010 and 2018. By 2018, these units tended to be found in central Nebraska at the highest rate. “Other” vacant units are not for sale or for rent and are not otherwise available to the marketplace. These units can become problematic if concentrated in certain areas and may create a “blighting” effect.

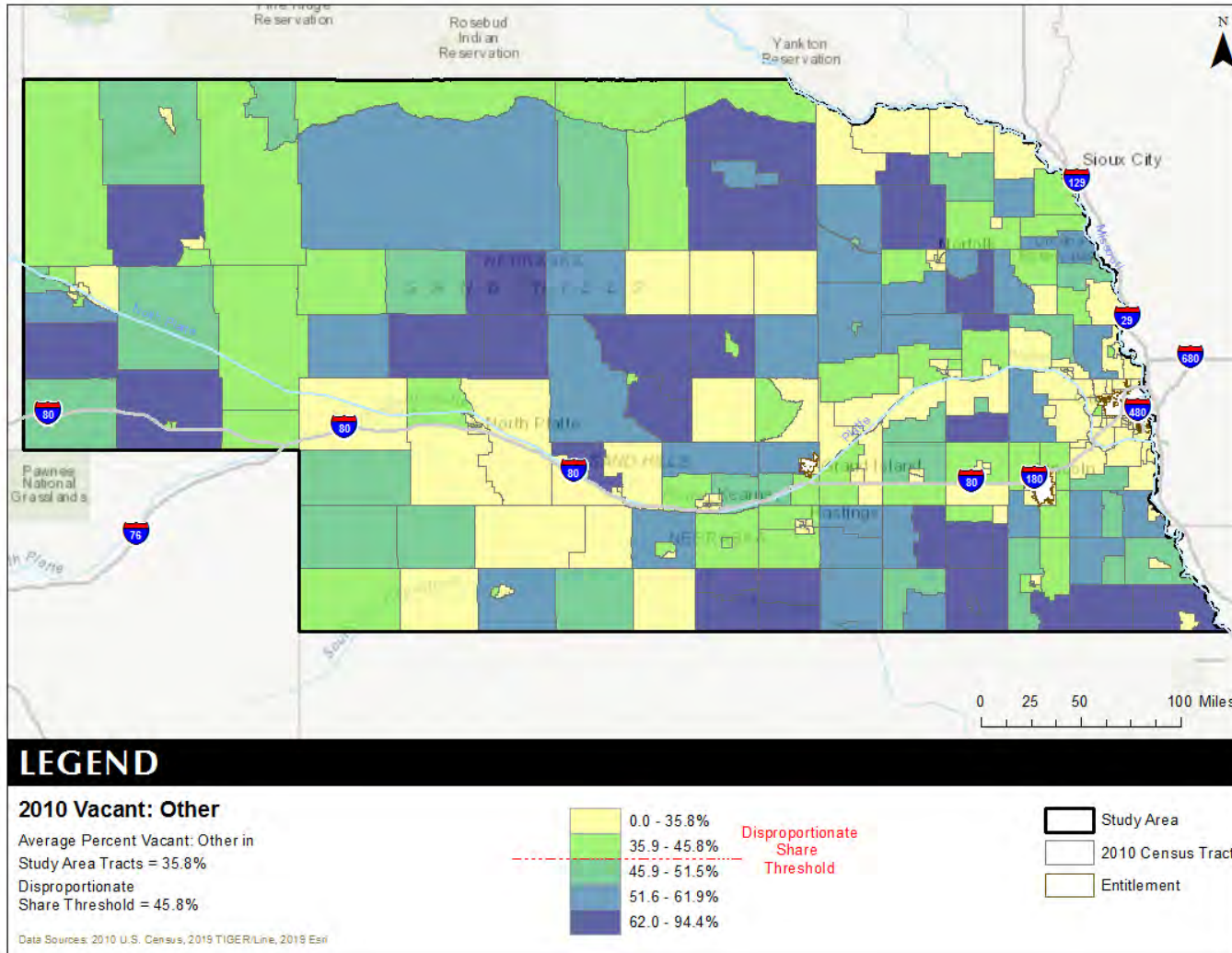
Map MA-20.1
2018 Vacant for Rent
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



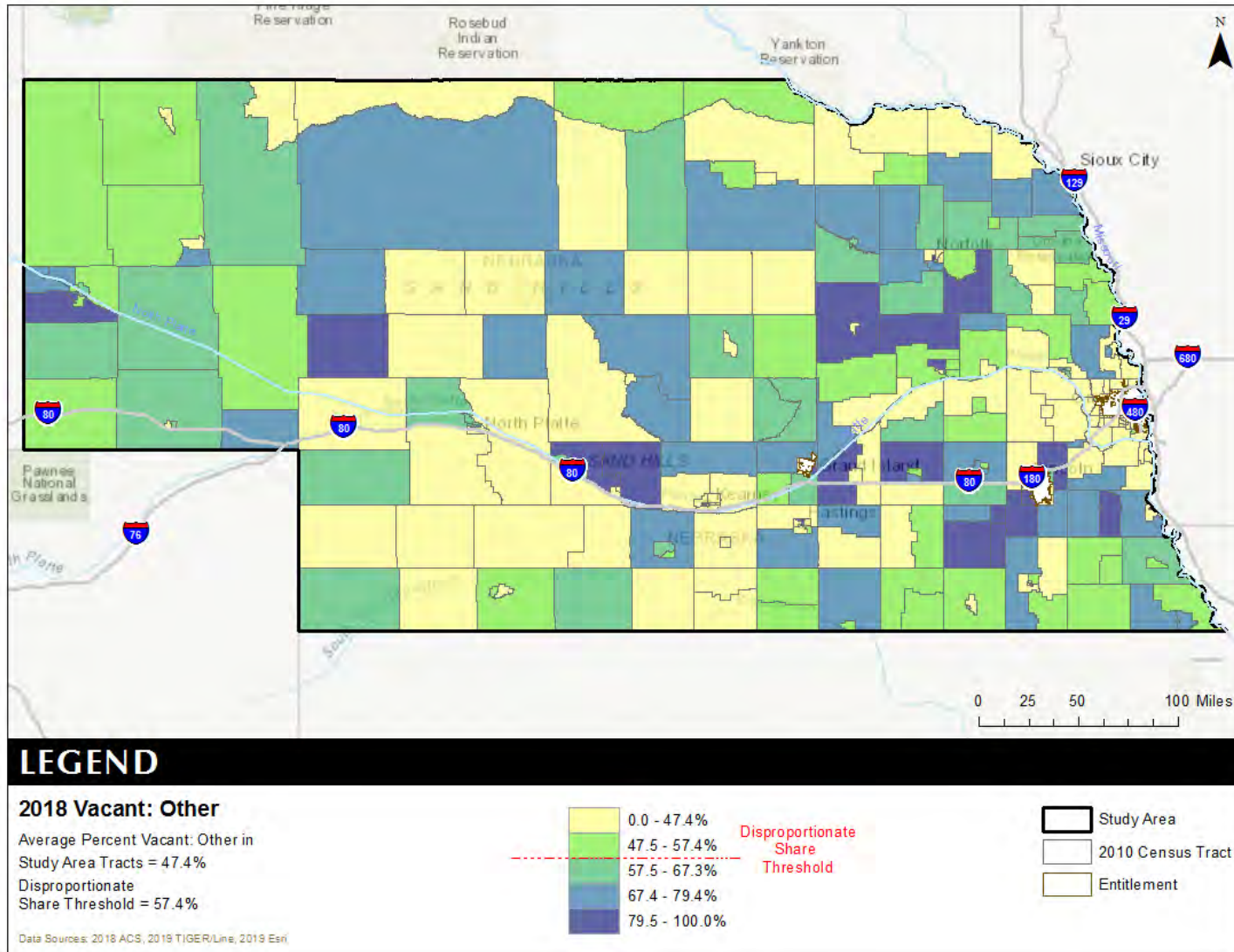
Map MA-20.2
2018 Vacant for Sale
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Map MA-20.3
2010 "Other" Vacant
 State of Nebraska Non-Entitlement
 2010 Census, Tigerline



Map MA-20.4
2018 “Other” Vacant
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Need for Owner and Rental Rehabilitation

As seen in Section MA-10, Table MA-10.6, there is a high need for owner rehabilitation. Rental rehabilitation is seen as a slightly higher need than owner rehabilitation. The age of the housing stock indicates at least a moderate level of need for rehabilitation for units on a large scale.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Table MA-20.4 shows the risk of lead-based paint for households with young children present. As seen therein, there are an estimated 24,670 households built between 1940 and 1979 with young children present, and 13,831 built prior to 1939.

Discussion

CDBG-DR

As outlined in detail in the Nebraska CDBG-DR Action Plan, the State has undertaken significant recovery efforts to identify the condition of units in need of repair.

Refer to the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

Table MA-20 4 Vintage of Households by Income and Presence of Young Children State of Nebraska Non-Entitlement 2012–2016 HUD CHAS Data			
Income	One or more children age 6 or younger	No children age 6 or younger	Total
Built 1939 or Earlier			
\$0 to \$23,430	1,226	9,240	10,466
\$23,431 to \$39,050	2,015	11,365	13,380
\$39,051 to \$62,480	2,960	17,015	19,975
\$62,481 to \$78,100	2,385	10,500	12,885
Above \$78,100	5,245	35,935	41,180
Total	13,831	84,055	97,886
Built 1940 to 1979			
\$0 to \$23,430	2,480	16,110	18,590
\$23,431 to \$39,050	3,530	18,125	21,655
\$39,051 to \$62,480	5,615	28,515	34,130
\$62,481 to \$78,100	3,845	17,315	21,160
Above \$78,100	9,200	60,280	69,480
Total	24,670	140,345	165,015
Built 1980 or Later			
\$0 to \$23,430	2,330	11,625	13,955
\$23,431 to \$39,050	1,985	10,965	12,950
\$39,051 to \$62,480	4,075	19,540	23,615
\$62,481 to \$78,100	3,970	12,470	16,440
Above \$78,100	17,850	71,025	88,875
Total	30,210	125,625	155,835
Total			
\$0 to \$23,430	6,036	36,975	43,011
\$23,431 to \$39,050	7,530	40,455	47,985
\$39,051 to \$62,480	12,650	65,070	77,720
\$62,481 to \$78,100	10,200	40,285	50,485
Above \$78,100	32,295	167,240	199,535
Total	68,711	350,025	418,736

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Not required in Statewide plan.

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	136	7,379	12,187	0	7,494	1,073	0	2,270
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Not applicable.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Public Housing Condition

Table 39 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Discussion:

Not applicable.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The following section describes the facilities and services available in the Nebraska Balance of State Continuum of Care.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Current & New	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	154		188	292	
Households with Only Adults	259		157	107	
Chronically Homeless Households				60	
Veterans				120	
Unaccompanied Youth	6		2	15	

Table 40 - Facilities Targeted to Homeless Persons

Describe mainstream services, such as health, mental health, and employment services to the extent those services are to complement services targeted to homeless persons

The Nebraska Department of Health and Human Services (DHHS) provide health services to extremely low income persons in Nebraska. Many divisions and agencies within DHHS administer services that complement services targeted to homeless persons. Some of these include:

- Nebraska Medicaid Program-providing a wide range of services from ambulance services to physician services;
- Division of Children and Family Services-providing a wide range of services that include child welfare and adult protective and safety services to economic support programs such as the Supplemental Nutrition Assistance Program, Aid to Dependent Children, energy assistance, and child care subsidy;
- Division of Development Disabilities-providing a wide range of services for individuals with developmental disabilities;
- Division of Public Health-providing many services that include WIC, health and safety wellness prevention, and even vital records; and
- Other entities that also provide health services throughout the state include the extension network of community and regional hospitals that are located in many hub communities.

Mental health services can also be found throughout Nebraska, but some services are not available within every community. The Mental Health Association of Nebraska has additional information and guidance at: <http://www.mha-ne.org/>

Community Action Partnership (CAP) has offices throughout Nebraska and is divided up into 9 Community Action Agencies that assist low income families in attaining economic stability and community engagement. See also <http://www.canhelp.org/>

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Within the State, there are many entities identified that assist homeless persons. Some of these include:

- Community Action Partnership (CAP) has offices throughout Nebraska and is divided up into 9 Community Action Agencies that assist low income families in attaining economic stability and community engagement.
- Nebraska Department of Economic Development-providing affordable housing throughout Nebraska that can include the development of permanent supportive housing and shelters.
- Nebraska DHHS-multiple services as noted above.
- Economic Development Districts-assisting homeless service providers in developing projects for the homeless population.
- Nebraska Housing Developers Association-serving as an advocate for affordable housing for persons, include the homeless or those at risk of homelessness.

Table NA-10 15 Homeless Service Providers Nebraska Balance of State CoC 2019 CoC HIC	
	Blue Valley Community Action Partnership Bright Horizons Care Corps Inc Center For Survivors Central Nebraska Community Action Partnership Cirrus House Columbus Rescue Mission Community Action Partnership of Lancaster and Saunders Counties Community Action Partnership of Mid-Nebraska Community Action Partnership of Western Nebraska Crisis Center Hall Co. Crossroads Rescue Mission DOVES Haven House Healing Hearts and Families Hope Crisis Center Hope Harbor Maryland Living Center Norfolk Rescue Mission Northeast Nebraska Community Action Partnership Northwest Community Action Program Parent-Child Center, Lexington Project Response Rape/Domestic Abuse Program, North Platte Region 5 Systems Residential Assistance to Families in Transition, Inc Safe Center Salvation Army Grand Island Southeast Nebraska Community Action Partnership The Bridge The Connection North Platte Veterans Administration, HUD VASH Program Blue Valley Community Action Partnership

- Council of State Community Development Agencies-serving as an advocate for State programs, including programs that further the activities of ESG and HOPWA.
- Non-profit homeless service providers-providing homeless services throughout the state.
- Nebraska Commission on Housing and Homelessness-providing collaboration with DED and DHHS and other homeless service providers to support programs for the homeless.
- Metro Area Continuum of Care for the Homeless-providing homeless services for persons in the Omaha metro area.
- Nebraska Balance of State Continuum of Care-providing homeless services for persons in Nebraska.
- Lincoln Coalition for the Homeless-providing homeless services for persons in Nebraska.
- Omaha Housing Authority-providing housing to persons who may have been homeless.
- Other Housing Authorities-providing housing to persons who may have been homeless.
- Nebraska AIDS Project-assisting persons with HIV/AIDS that includes those who are homeless.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

There are a variety of services available in the State for special needs populations, including at-risk youth, seniors, substance abuse, and persons with disabilities.

HOPWA Assistance Baseline Table

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	12
PH in facilities	0
STRMU	40
ST or TH facilities	0
PH placement	0

Table 41 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Throughout Nebraska, public and private facilities and services are available to special needs populations, which require supportive housing. Below are descriptions of some of the available services for special needs populations.

Elderly and Frail Elderly

The Nebraska Area Agencies on Aging include eight agencies across the State dedicated to addressing the most pressing needs and concerns of the elderly in Nebraska. These agencies develop or assist in the development of needed services and programs. Additionally, they help connect the elderly with these services and programs and ensure their needs are being met. Some services offered include: wellness assistance, housing, legal services, end of life planning, social involvement, and other basic needs assistance. The Area Agencies on Aging have offices in Western, West Central, South Central, Northeast, Eastern, Blue River, Southeast, and Midland areas of Nebraska.

Persons with Disabilities (mental, physical, and developmental)

Nebraska has the Program for Disabled Persons and Family Support (DPFS) that provides up to \$300 a month of funding for services to individuals with disabilities to help them continue to live independently or help families stay together. The needs of the clients determine which services can be funded through DPFS. Some of the funded services include: attendant/personal care, home health care, housekeeping, transportation, special equipment, and home modifications.

For children with disabilities there is the Disabled Children's Program (DCP). The DCP is a program that serves the needs of children with disabilities by paying for non-medical services. These services need to be related to the child's disability. A worker helps the family develop a plan for the needed services. Some services available include: Respite services to give the family a break from caregiving, special equipment like van lifts, porch or stair lifts, and bath aids, home modifications to make the home more accessible for the child with disabilities and training for parents about the child's disability and care.

Nebraska administers several intermediate care facilities for individuals with intellectual or developmental disabilities. These facilities include: Beatrice State Developmental Center, 400 State, Sheridan Cottages, State Cottages, Solar Cottages, and Bridges.

Additionally, there is the Assistance to the Aged, Blind, or Disabled program (AABD). The AABD program provides financial aid and medical assistance to elderly persons or persons who are blind or disabled.

Persons with Alcohol/Other Drug Addictions

There are several facilities across the state to help those with alcohol and other drug addictions. The following is a list of those facilities that provide long-term care, short-term care, substance abuse treatment, and after-treatment housing: Human Services Inc. (Alliance, NE), Catholic Charities of Nebraska, Friendship House (Grant Island, NE), The Bridge (Hastings, NE), Houses of Hope of Nebraska (Lincoln, NE), St. Monica's (Lincoln, NE), Women in Community Services (Lincoln, NE), The Bridge Behavioral Health (Lincoln, NE), Link (Norfolk, NE), Women's Empowering Life Line (Norfolk, NE), Nebraska Urban Indian Health Coalition (Omaha, NE), Santa Monica (Omaha, NE), Siena/Francis House (Omaha, NE), Arch Men's Halfway House (Omaha, NE), NOVA Treatment Community (Omaha, NE).

Services that are available to assist persons who are extremely low-income, have substance use disorders, and receiving behavioral health services funded by DHHS include tenancy support services and housing and housing-related assistance through the six Regional Behavioral Health Authorities (RBHA). RBHAs operate the DHHS Division of Behavioral Health funded Housing Related Assistance Program (RAP) providing coordination and assistance within their Region. The RAP serves as a bridge program to more permanent, mainstream housing resources. RBHAs work with SUD treatment facilities as part of their referral network.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

There are HUD Section 811 programs (supportive housing for persons with disabilities) in numerous locations in Nebraska. This is the primary housing funding source to finance affordable housing for persons with mental and physical disabilities. Other state and federal funding sources exist to assist with funding housing for those with serious mental illness. These include Section 42 Low-Income Housing Tax Credit program and the Nebraska Affordable Housing Trust Fund. These programs fund affordable housing development and/or rehabilitation of units that are available to those returning from mental and physical health institutions so they can receive appropriate supportive housing.

Additionally, in order to assure that adults with serious mental illness are able to avoid becoming homeless, the State funded Housing Related Assistance Program (RAP) provides ongoing rental assistance to seriously mentally ill persons able to be discharged from state psychiatric facilities but lacking safe and

affordable housing. Assistance provided by RAP affords an opportunity for a person to achieve and remain in permanent, affordable, community integrated housing while receiving behavioral health service supportive of recovery. RAP serves as a bridge to other mainstream housing resources or living in independent housing without rental assistance.

In regard to the HOPWA Program, HOPWA staff conduct outreach activities to jails, prisons, homeless shelters, mental health facilities, hospital emergency rooms, etc., periodically throughout the year. Brochures are provided to staff at various facilities and an overview of discharge planning services is provided. When HOPWA staff are made aware of an individual with HIV/AIDS that will be discharging from an institution or facility, HOPWA staff will meet with individuals and begin looking for supportive housing options so housing and wrap around services are in place at the time of discharge.

Persons returning from mental health treatment facilities who qualify for Nebraska's SAMHSA-funded Project for Assistance in Transition from Homelessness (PATH) program (adults with serious mental illnesses experiencing homelessness who are literally and chronically homeless) are assisted in the complex service environment providing housing, alcohol and drug abuse treatment, health care and treatment of mental illness, and income support and benefits counseling through assertive outreach and case management. PATH services are in areas of the state with the highest concentration of people who are experiencing homelessness. PATH providers are active partners in the Nebraska "Opening Doors: Plan to Prevent and End Homelessness in the State of Nebraska" and Nebraska Continuums' of Care Coordinated Entry systems.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

In order to address the housing and supportive services needs for elderly, frail elderly, persons with disabilities (mental, physical, and developmental), persons with alcohol or other drug addiction, and persons with HIV/AIDS, the State will utilize many of the programs and strategies listed above. In addition to these strategies, the State will continue to work to prevent homelessness among persons with special needs.

CDBG will be used to expand and continue non-housing community development and supportive services and improve aging infrastructure and divestment in communities. Non-housing community development services will be made available to all eligible participants including persons with special needs. Maintenance of public facilities will also include removal of architectural barriers and other ADA compliance measures. These activities will meet the priority needs of Community Development and Economic Development, the overarching objectives of providing a suitable living environment and expanding economic opportunity, and the outcomes of improved availability/accessibility, improved affordability, and improved sustainability.

Additionally, CDBG, HTF, and HOME funds will be used to provide affordable housing to persons that are very low to moderate-income. These housing programs will be made available to all eligible participants including persons with special needs. These activities will meet the priority need of Housing, the overarching objectives of providing decent housing and providing a suitable living environment, and the outcomes of improved availability/accessibility, improved affordability, and improved sustainability.

Finally, using HOPWA funds, the State will continue housing and supportive services for persons with HIV/AIDS and their family members. These activities will meet the priority need of HOPWA Services, the overarching objectives of providing decent housing and providing a suitable living environment, and the outcomes of improved availability/accessibility and improved affordability.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not applicable.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

According to the Housing and Community survey, the top-rated barriers to the development of affordable housing are the cost of land or lot, cost of labor, cost of materials, and the Not In My Back Yard (NIMBY) mentality.

Table MA-40.1 Providing Decent and Affordable Housing State of Nebraska Housing and Community Development Survey	
Question	Response
Do any of the following act as barriers to the development or preservation of affordable housing in your community:	
Cost of land or lot	431
Cost of labor	403
Cost of materials	400
Not In My Back Yard (NIMBY) mentality	333
Lack of affordable housing development policies	279
Lack of qualified contractors or builders	258
Construction fees	193
Lack of available land	192
Density or other zoning requirements	147
Lack of other infrastructure	137
Permitting process	137
Permitting fees	126
Building codes	110
Lot size	95
Lack of sewer system	86
Impact fees	83
Lack of water system	63
ADA codes	62
Lack of water	14

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The following section describes the economic atmosphere in the non-entitlement areas of Nebraska. This section utilizes, along with other sources, Bureau of Economic Analysis (BEA) and Bureau of Labor Statics (BLS) data. BLS data can be calculated down to the city level, and therefore, is shown in this section to represent the non-entitlement areas. BEA data is only available at the County level and reflects the entirety of the State of Nebraska.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	13,243	13,887	3	4	1
Arts, Entertainment, Accommodations	43,217	33,672	10	10	-1
Construction	27,012	26,236	6	7	1
Education and Health Care Services	69,619	52,160	17	15	-2
Finance, Insurance, and Real Estate	28,973	18,039	7	5	-2
Information	8,242	6,109	2	2	0
Manufacturing	61,500	63,179	15	18	3
Other Services	13,353	11,159	3	3	0
Professional, Scientific, Management Services	29,397	17,297	7	5	-2
Public Administration	0	0	0	0	0
Retail Trade	60,296	47,750	14	14	-1
Transportation and Warehousing	17,240	22,583	4	6	2
Wholesale Trade	27,435	25,223	7	7	1
Total	399,527	337,294	--	--	--

Table 42 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	569,464
Civilian Employed Population 16 years and over	546,489
Unemployment Rate	3.83
Unemployment Rate for Ages 16-24	13.44
Unemployment Rate for Ages 25-65	2.51

Table 43 - Labor Force

Data Source: 2011-2015 ACS

Table MA-45.1 shows labor force statistics for the State of Nebraska Non-Entitlement between 1990 and 2018. The unemployment rate in the State of Nebraska Non-Entitlement was 2.7 percent in 2018, with 15,361 unemployed persons and 569,892 in the labor force. The statewide unemployment rate in 2018 was 2.8 percent. In 2017, 551,420 people were employed, 16,040 were unemployed, and the labor force totaled 567,460 people.

Table MA-45 1 Labor Force Statistics State of Nebraska Non-Entitlement 1990 - 2018 BLS Data					
Year	State of Nebraska Non-Entitlement			Unemployment Rate	Statewide Unemployment Rate
	Unemployment	Employment	Labor Force		
1990	10,522	484,413	494,935	2.1%	2.3%
1991	12,196	490,814	503,010	2.4%	2.7%
1992	13,203	496,149	509,352	2.6%	2.9%
1993	13,219	505,300	518,519	2.5%	2.8%
1994	13,254	518,773	532,027	2.5%	2.6%
1995	13,700	526,114	539,814	2.5%	2.6%
1996	14,346	528,279	542,625	2.6%	2.7%
1997	12,969	530,691	543,660	2.4%	2.5%
1998	13,910	534,811	548,721	2.5%	2.6%
1999	15,071	536,900	551,971	2.7%	2.8%
2000	14,810	533,806	548,616	2.7%	2.8%
2001	16,049	533,522	549,571	2.9%	3.1%
2002	18,157	532,867	551,024	3.3%	3.6%
2003	19,698	537,261	556,959	3.5%	3.9%
2004	19,411	539,683	559,094	3.5%	3.9%
2005	18,685	538,090	556,775	3.4%	3.8%
2006	16,953	539,163	556,116	3%	3.1%
2007	16,151	541,985	558,136	2.9%	3%
2008	18,557	537,496	556,053	3.3%	3.3%
2009	25,913	525,598	551,511	4.7%	4.6%
2010	26,428	546,439	572,867	4.6%	4.6%
2011	25,180	553,238	578,418	4.4%	4.4%
2012	22,921	560,015	582,936	3.9%	4%
2013	21,889	561,987	583,876	3.7%	3.8%
2014	18,758	555,721	574,479	3.3%	3.3%
2015	17,442	557,802	575,244	3%	3%
2016	17,745	558,958	576,703	3.1%	3.1%
2017	16,040	551,420	567,460	2.8%	2.9%
2018	15,361	554,531	569,892	2.7%	2.8%

Diagram MA-45.1 shows the unemployment rate for the State of Nebraska Non-Entitlement. During the 1990's the average rate for the State of Nebraska Non-Entitlement was 2.5 percent, which compared to 2.6 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 3.3 percent, which compared to 3.5 percent statewide. Since 2010, the average unemployment rate was 3.5 percent. Over the course of the entire period the State of Nebraska Non-Entitlement had an average unemployment rate of 3.1 percent, which was lower than the State rate of 3.2 percent.

Diagram MA-45.1
Annual Unemployment Rate
 State of Nebraska Non-Entitlement
 1990 – 2018 BLS Data

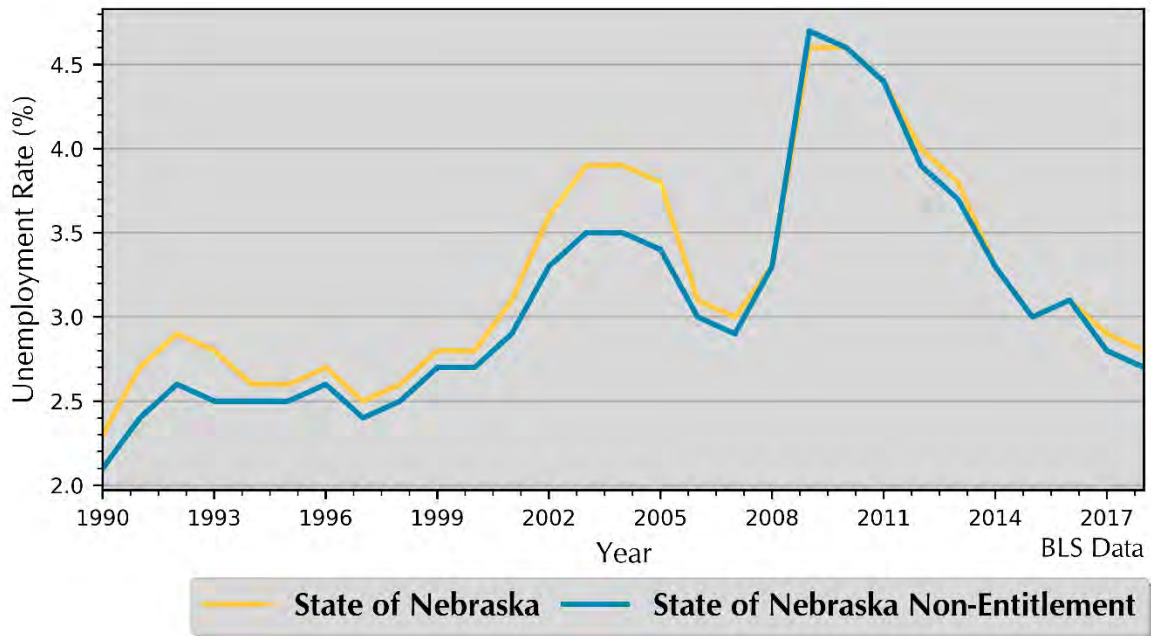
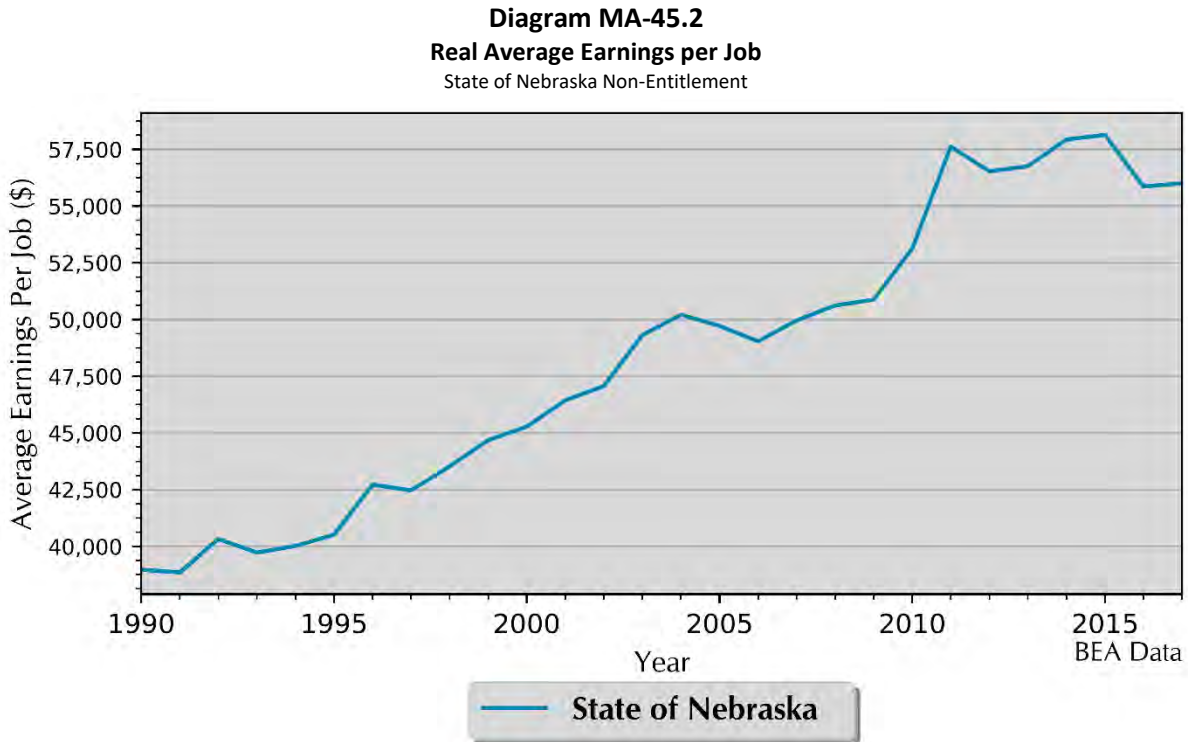


Diagram MA-45.2 shows real average earnings per job for the State of Nebraska Non-Entitlement from 1990 to 2017. Over this period the average earning per job for the State of Nebraska Non-Entitlement was 48,296 dollars.



Occupations by Sector	Number of People Median Income
Management, business and financial	123,695
Farming, fisheries and forestry occupations	19,978
Service	58,116
Sales and office	125,686
Construction, extraction, maintenance and repair	62,574
Production, transportation and material moving	40,403

Table 44 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	403,176	79%
30-59 Minutes	90,586	18%
60 or More Minutes	16,929	3%
Total	510,691	100%

Table 45 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	24,469	2,236	11,418
High school graduate (includes equivalency)	110,164	4,220	26,280
Some college or Associate's degree	165,678	4,753	27,931
Bachelor's degree or higher	135,667	1,835	15,817

Table 46 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18-24 yrs.	25-34 yrs.	35-44 yrs.	45-64 yrs.	65+ yrs.
Less than 9th grade	1,477	4,033	4,217	7,972	10,412
9th to 12th grade, no diploma	11,013	6,069	5,731	11,058	11,967
High school graduate, GED, or alternative	24,759	26,407	26,588	87,803	71,274
Some college, no degree	39,082	31,892	29,616	69,358	37,728
Associate's degree	7,761	18,565	17,224	33,599	8,105
Bachelor's degree	7,203	30,886	28,849	48,365	18,188
Graduate or professional degree	304	10,112	14,019	23,967	10,684

Table 47 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	10,200,190
High school graduate (includes equivalency)	42,549,034
Some college or Associate's degree	49,776,852
Bachelor's degree	44,751,453
Graduate or professional degree	30,880,886

Table 48 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Education

Education and employment data from the State of Nebraska Non-Entitlement 2018 Five-Year ACS is presented in Table MA-45.2, Table MA-45.3, and Table MA-45.4. In 2018, 562,663 people were in the labor force, including 546,473 employed and 16,190 unemployed people. The unemployment rate for State of Nebraska Non-Entitlement was estimated at 2.9 percent in 2018.

Table MA-45 2 Employment, Labor Force and Unemployment State of Nebraska Non-Entitlement 2018 Five-Year ACS Data	
Employment Status	2018 Five-Year ACS
Employed	546,473
Unemployed	16,190
Labor Force	562,663
Unemployment Rate	2.9%

Table MA-45.3, and Table MA-45.4 show educational attainment in the State of Nebraska Non-Entitlement. In 2018, 92.7 percent of households had a high school education or greater, including 29.2 percent with a high school diploma or equivalent, 36.6 percent with some college, 17.8 percent with a Bachelor's Degree, and 8.0 percent with a graduate or professional degree.

Table MA-45 3 High School or Greater Education State of Nebraska Non-Entitlement 2018 Five-Year ACS Data	
Education Level	Households
High School or Greater	388,728
Total Households	419,264
Percent High School or Above	92.7%

Table MA-45 4 Educational Attainment State of Nebraska Non-Entitlement 2018 Five-Year ACS Data		
Education Level	2018 5-year ACS	Percent
Less Than High School	66,997	8.5%
High School or Equivalent	229,800	29.2%
Some College or Associates Degree	288,672	36.6%
Bachelor's Degree	139,902	17.8%
Graduate or Professional Degree	62,783	8.0%
Total Population Above 18 years	788,154	100.0%

Based on the Business Activity table above, what are the major employment sectors within the state?

According to the Business Activity Table, the largest numbers of workers work in Manufacturing, Education, and Health Care Services. This is followed by Retail Trade and Arts, Entertainment and Accommodations.

Describe the workforce and infrastructure needs in the state:

The Housing and Community Development (HCD) survey found the highest rated needs for business and economic development include the retention of existing businesses, the attraction of new businesses, labor availability, and fostering businesses with higher paying jobs.

Table MA-45.5 Providing a Suitable Living Environment State of Nebraska Housing and Community Development Survey						
Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Please rate the need for the following BUSINESS AND ECONOMIC DEVELOPMENT activities in Nebraska:						
Retention of existing businesses	4	17	176	466	322	985
Attraction of new businesses	4	47	231	381	322	985
Labor Availability	12	85	176	371	341	985
Foster businesses with higher paying jobs	15	57	208	369	336	985
Expansion of existing businesses	7	52	260	331	335	985
Provision of job training	7	65	263	319	331	985
Enhancement of business' infrastructure (such as roads, broadband, water access, sewage, electricity, etc)	9	130	244	269	333	985
Provision of job re-training, such as after plant or other closures	11	133	252	253	336	985
Provision of working capital for businesses	16	121	321	186	341	985
Provision of venture capital	26	151	287	161	360	985
Provision of technical assistance for businesses	16	146	321	158	344	985
Development of business incubators	32	179	270	149	355	985
Investment in equity partners	21	149	306	145	364	985
Development of industrial and/or business parks	45	231	225	135	349	985
Other	34	6	3	40	902	985

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

At the date of this document, the United States is experiencing an unprecedented health crisis with the CONV-19 virus. Many businesses are closing their doors to help with the national efforts to curb the spread of the virus. The impacts of this national emergency are not known yet, however, some business experts are predicting lasting economic impacts across the nation. As the country continues to deal with the virus's impacts, the State of Nebraska will evaluate what resources can be utilized throughout the State.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

The Housing and Community Development survey indicated that many people in the State have a moderate level of need for job training, including training opportunities for youth. These activities were the moderately rated needs for business and economic development in the State.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

The Nebraska Department of Economic Development has several job training programs, including Customized Job Training (CJT) that provides employee training assistance to businesses that maintain, expand, and diversify the state's economic base. The Developing Youth Talent Initiative (DYTI) creates a collaboration between Nebraska businesses and public schools, exposing students to careers in manufacturing and Information Technology. Intern Nebraska (InterNE) provides grants to businesses and non-profits that want to create new internships in the state.⁶

Describe any other state efforts to support economic growth.

The Nebraska Department of Economic Development offers a variety of opportunities for businesses to start or expand. This includes the Nebraska Academic Research and Development Grant, the Nebraska Innovation Fund Prototype Grant, the Nebraska Small Business Innovation Research/Small Business Tech Transfer Grant Program, and the Nebraska Seed Investment Program. The State also offers the Business Retention and Expansion Program to assist with the retention and expansion of existing businesses. The department gives preference for many business incentives to businesses locate in full or in part in designated Enterprise Zones.⁷

Discussion

The economy in the State of Nebraska Non-Entitlement showed an unemployment rate at 2.7 percent in 2018. The average earning per job had grown until the recent recession then stagnated. In 2018, some 92.7 percent of households had a high school education or greater, including 29.2 percent with a high school diploma or equivalent, 36.6 percent with some college, 17.8 percent with a Bachelor's Degree, and 8.0 percent with a graduate or professional degree.

⁶ <https://opportunity.nebraska.gov/expand-your-business/resources/>

⁷ <https://opportunity.nebraska.gov/expand-your-business/resources/>

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

As seen in Map MA-50.1, there are concentrations of housing problems found throughout the State. These areas have housing problems at a rate between 25.2 and 38.6 percent, compared to areas with rates below 17.9 percent in other parts of the State. In this map, the definition of "concentration" is any area that sees a disproportionate share of housing problems, counted as any area that experiences housing problems at a rate at least ten (10) percentage higher than the area average.

The concentrations of housing problems by race are shown in Maps MA-50.2 through Map MA-50.4. These maps show the concentration of housing problems for Asian, black, and Hispanic households.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Map MA-50.5 shows the concentration of American Indian households in the non-entitlement areas of the State. A concentration exists if there is any Census tract that contains American Indian households at a rate at least 10 percentage points higher than the jurisdiction average, or a disproportionate share. These concentrations were found in the northern parts of the State.

Hispanic households are shown in Map MA-50.6. These households saw the highest concentrations in central and western Nebraska.

Poverty is shown in Map MA-50.7. The highest concentrations of poverty were in western and central Nebraska. The definition of concentration for poverty is when a disproportionate share exists in any one area of the State. A disproportionate share exists when any one area sees rates of poverty at least 10 percentage points higher than the jurisdiction average.

What are the characteristics of the market in these areas/neighborhoods?

The housing markets in these area tended to have a higher proportion of renter households, as shown in Map MA-15.2. In addition, median home values and median contract rents tended to be lower in these areas than in other areas in the State. This is shown in Maps MA-15.3 and MA-15.4.

Are there any community assets in these areas/neighborhoods?

There are a variety of services and community assets throughout the State of Nebraska, including access to city schools and parks, as well as grocery stores, and service providers.

Are there other strategic opportunities in any of these areas?

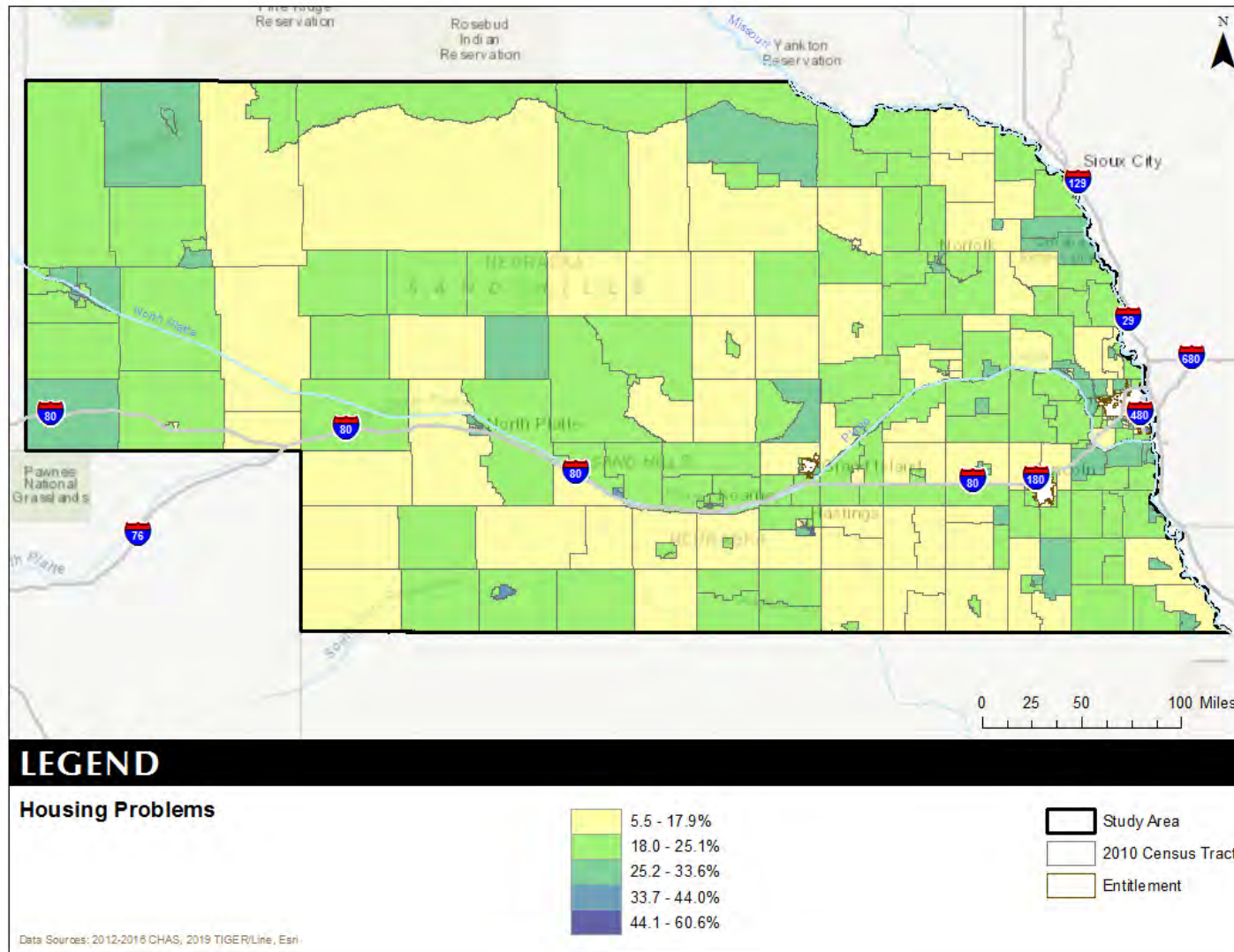
Areas with high concentrations of low income and poverty level households may present an opportunity for investment through services and public facility funding.

CDBG-DR

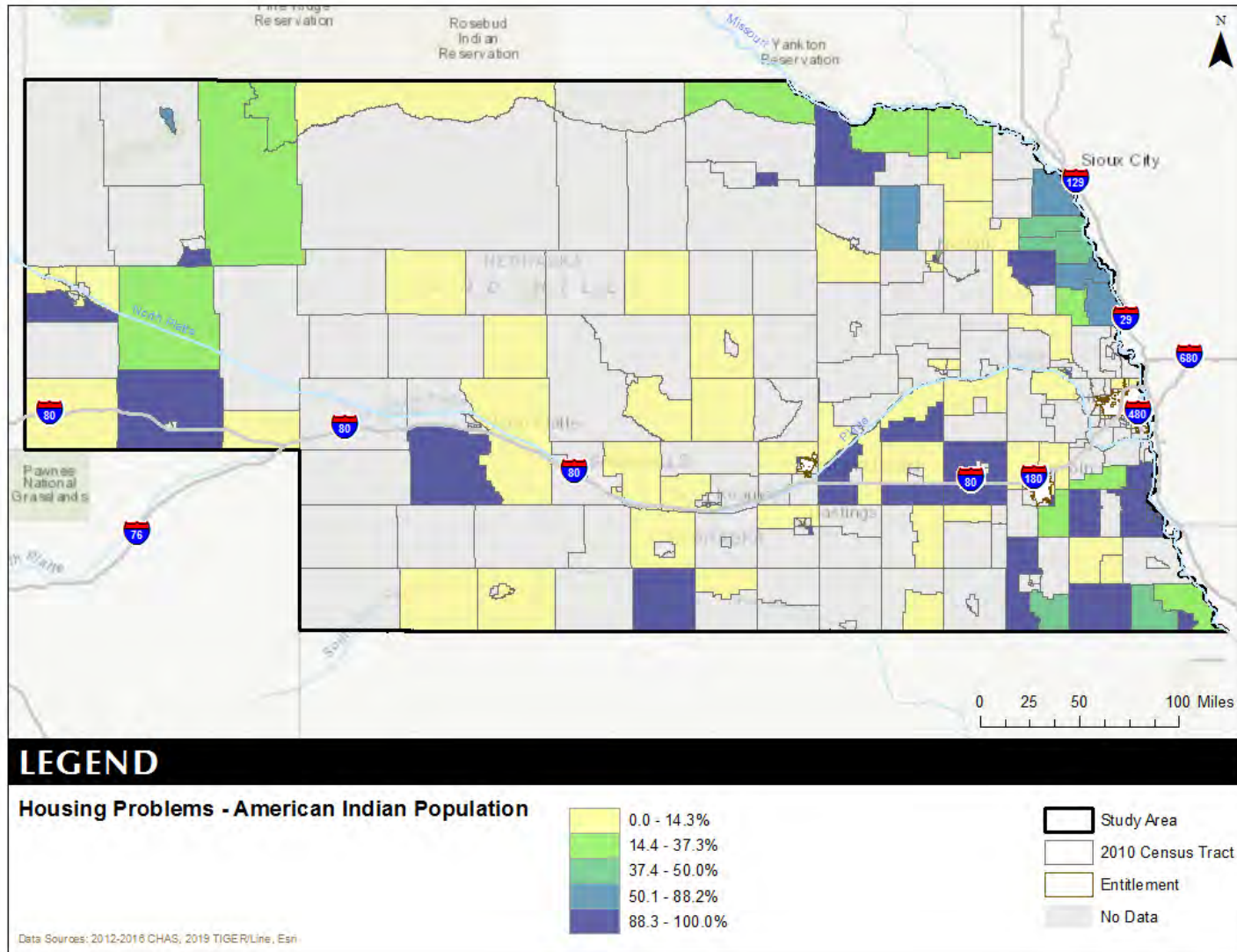
As outlined in detail in the Nebraska CDBG-DR Action Plan, the State has undertaken significant recovery efforts to address housing needs as result of the disaster.

Refer to the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

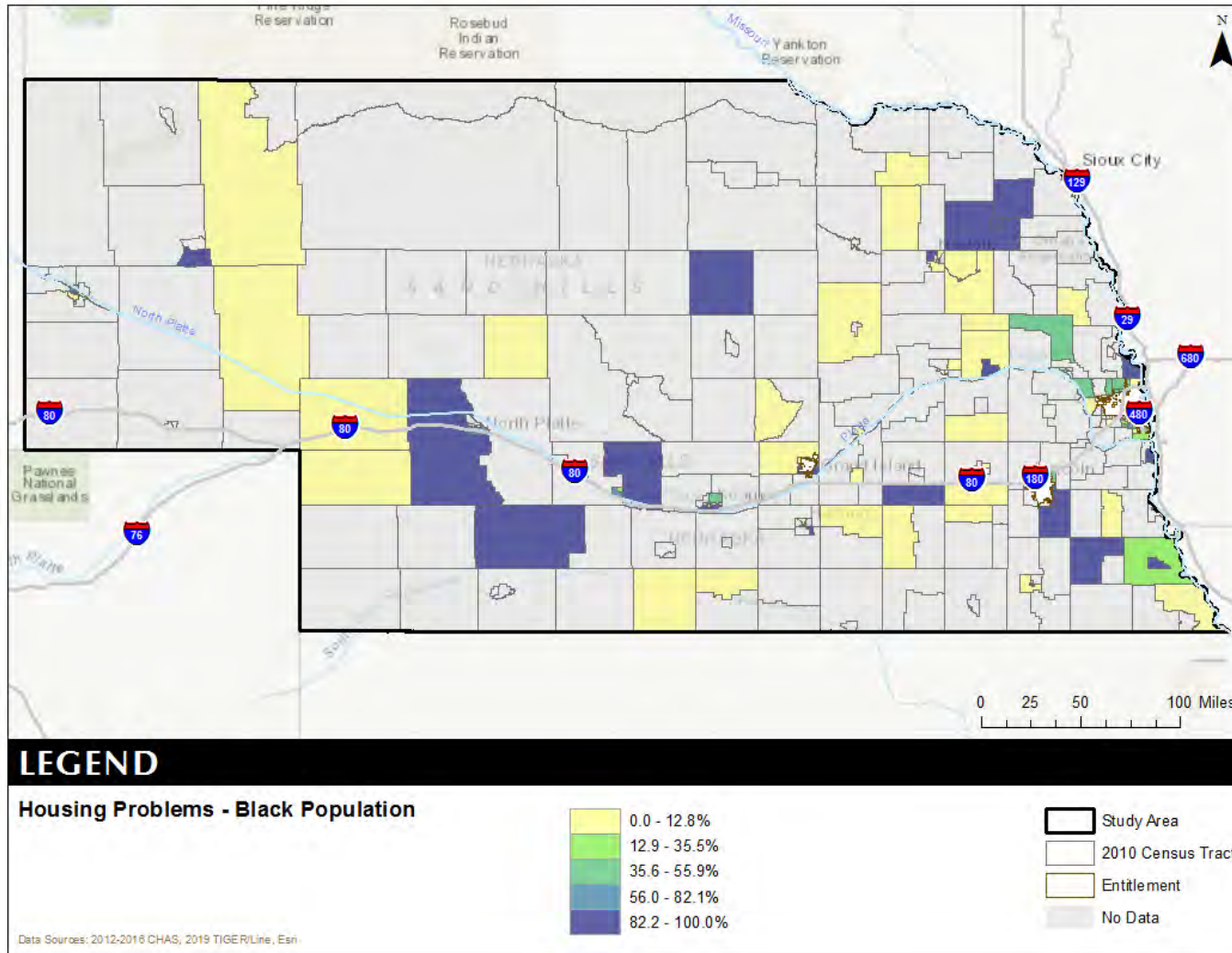
Map MA-50.1
Housing Problems
State of Nebraska Non-Entitlement
2016 CHAS, Tigerline



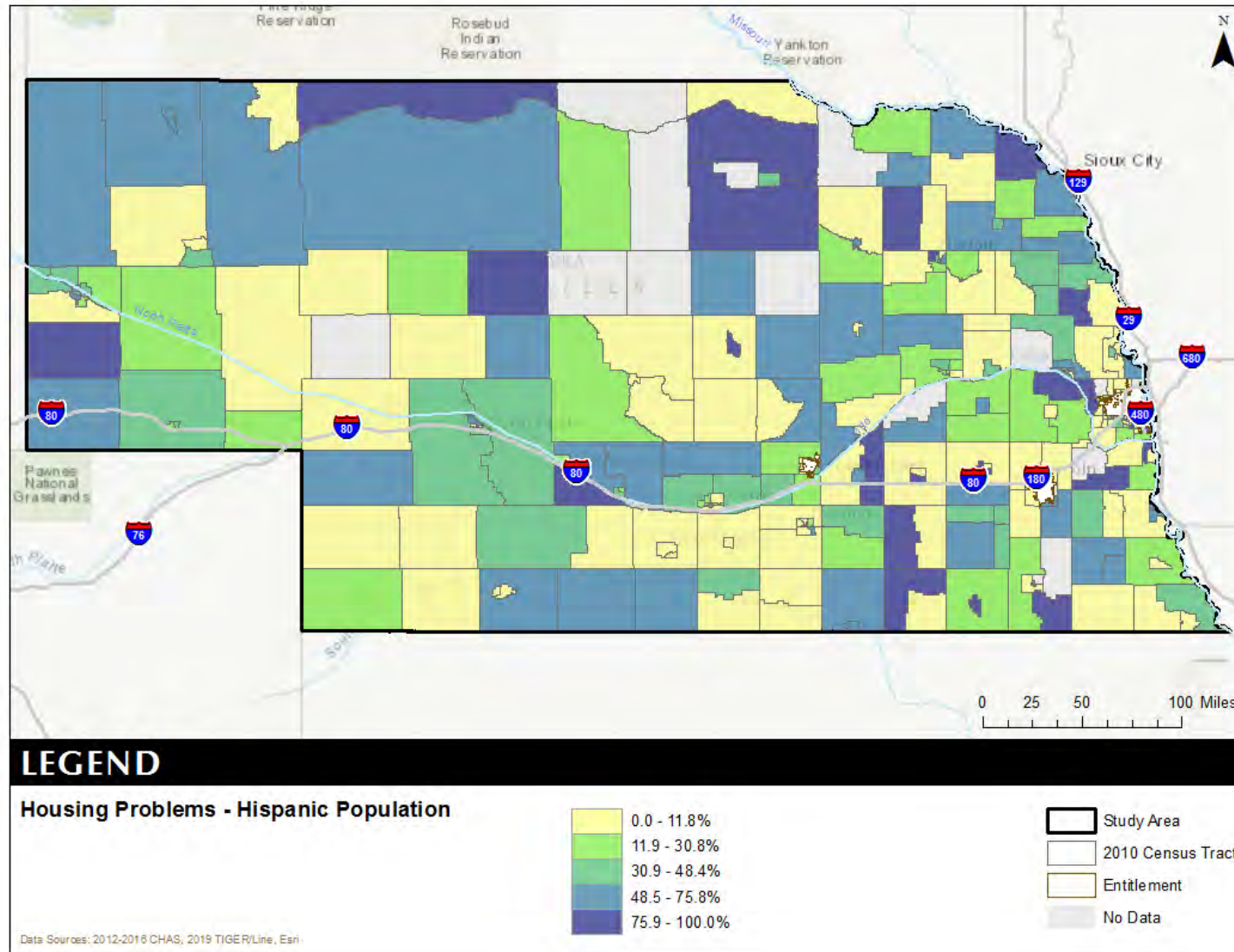
Map MA-50.2
American Indian Housing Problems
State of Nebraska Non-Entitlement
2016 CHAS, Tigerline



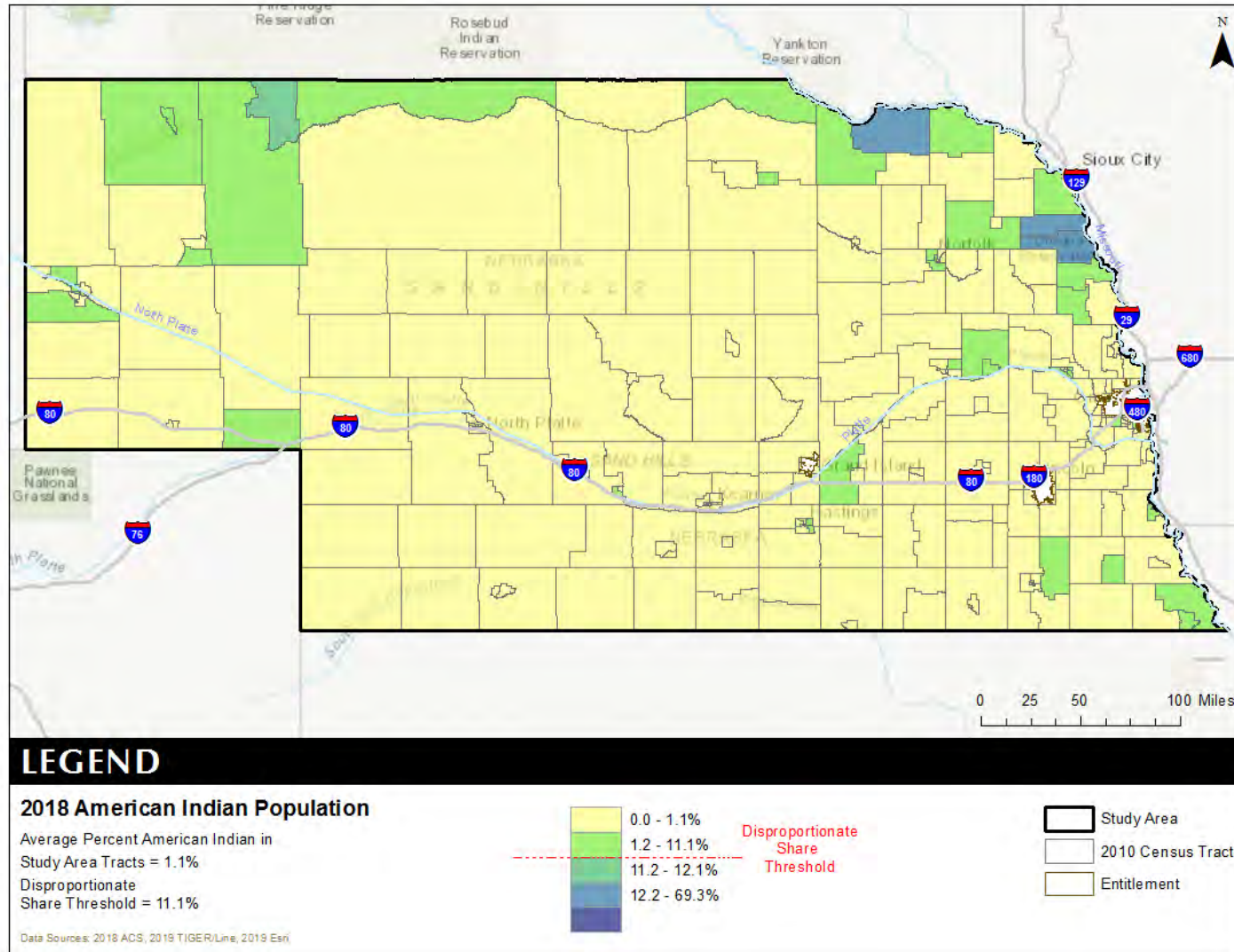
Map MA-50.3
Black Housing Problems
State of Nebraska Non-Entitlement
2016 CHAS, Tigerline



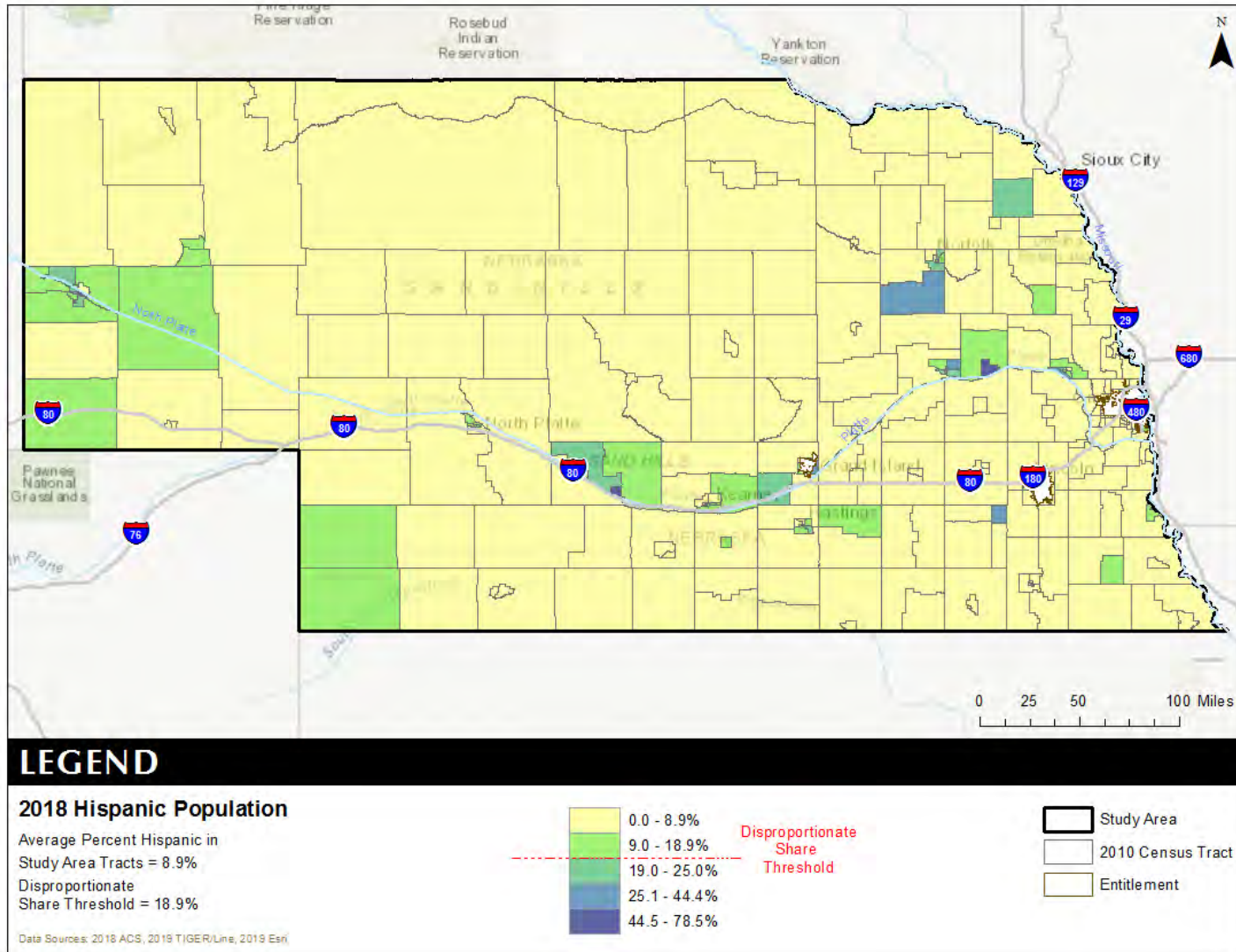
Map MA-50.4
Hispanic Housing Problems
State of Nebraska Non-Entitlement
2016 CHAS, Tigerline



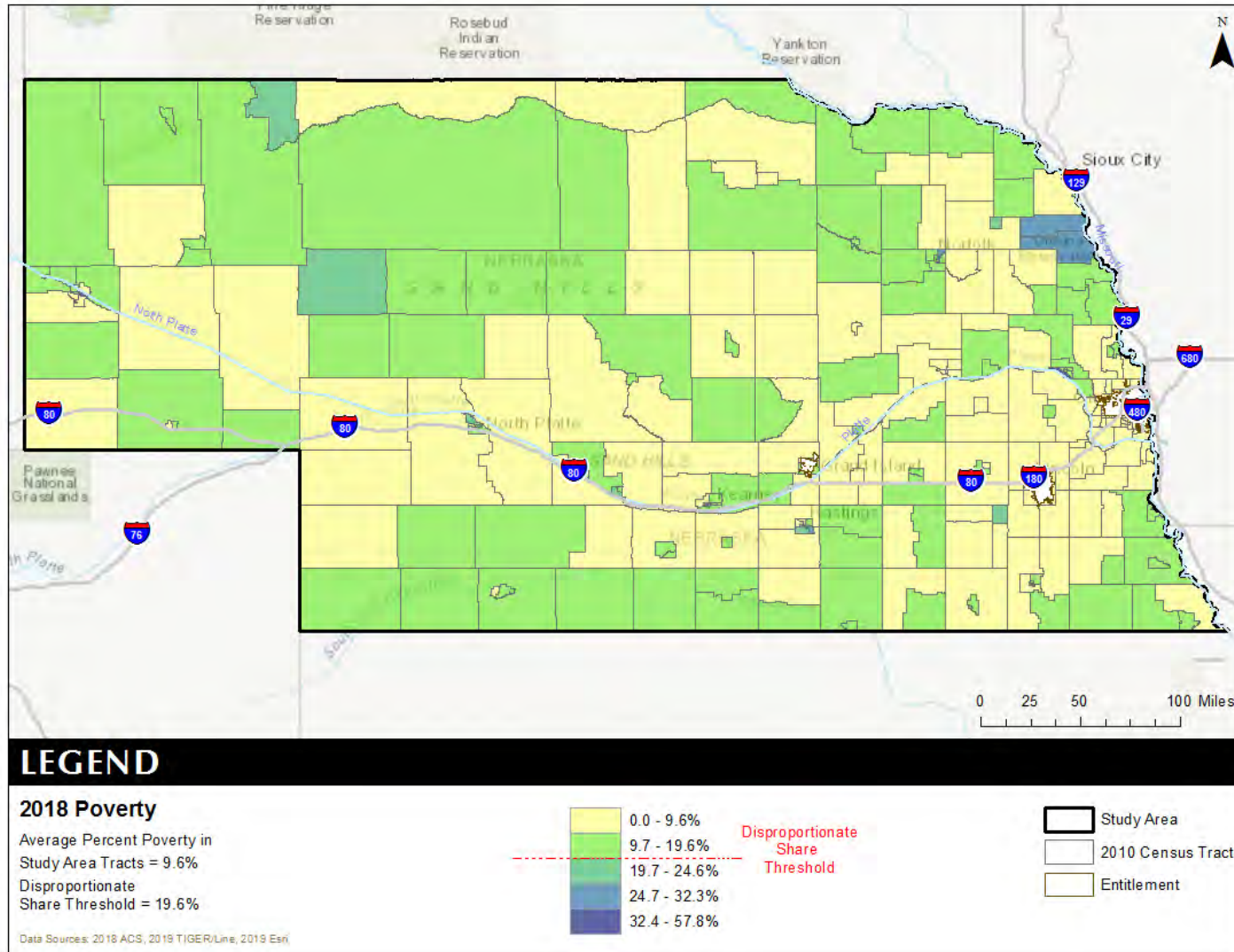
Map MA-50.5
2018 American Indian Households
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Map MA-50.6
2018 Hispanic Households
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



Map MA-50.7
2018 Poverty
 State of Nebraska Non-Entitlement
 2018 ACS, Tigerline



MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

According to the State’s Broadband Household Survey, some 86 percent of Nebraska households have internet at home, some 82 percent have broadband service at home.⁸ Households in rural areas are less likely to have broadband services, at 73 percent versus 90 percent of households in the Lincoln area. Lower income households are less likely to have broadband access at home. The Survey found that 53 percent of the lowest income households had broadband access.

Available service is shown in the FCC Fixed Broadband Maps. These maps show lower levels of service in the more rural areas of the State, with fewer broadband providers.⁹ These maps do show most areas in the State with at least some level of broadband service, however, these maps are flawed for service provided as it doesn’t control for business-only availability.

In 2019, Governor Pete Ricketts established the Rural Broadband Task Force (RBTF), to review issues relating to availability, adoption, and affordability of broadband services in rural areas of Nebraska. The RBTF is comprised of leadership from state agencies (including DED) and commissions; the Nebraska legislature; public power districts; University of Nebraska-Lincoln; and private businesses communication companies; etc.

The task force's reported that:

- eighty-nine percent of Nebraskans—but only 63% of rural Nebraskans—have fixed broadband of at least 25 Mbps down/3 Mbps up available, according to the latest data available from the FCC (June 2018).
- Current state and federal broadband mapping efforts likely overstate broadband coverage and need to be improved. Nebraska’s broadband map currently utilizes Form 477 data released by the FCC. Using Form 477, fixed broadband providers report the type of technology and maximum advertised speeds in Mbps up and down by census block to the FCC. The use of census block reporting can overstate broadband availability in large, rural, census blocks.
- As more services move online, internet access is becoming a necessity. Students who need to use the internet to complete homework are especially impacted. The term “homework gap” is used to describe the challenge that students who lack home internet access face in completing online assignments. Libraries are key community partners in providing internet and computer access to students and the general public—especially in rural areas. However, 84% of Nebraska public libraries serving populations less than 2,500 reported internet speeds of less than 24 Mbps down.
- Public-private broadband partnerships to deploy broadband have primarily been utilized in communities, but not rural areas outside of city or town limits. Some models, however, could be adapted for use in rural areas. Public power districts and cooperatives could play a role in advancing the deployment of broadband services in rural Nebraska through public-private partnerships. Public power districts and cooperatives may own fiber rings to connect necessary

⁸ <https://broadband.nebraska.gov/documents/household-survey-report.pdf>

⁹ <https://broadbandmap.fcc.gov/#/>

electric controls and data points. The communications network could be leveraged to facilitate the deployment of broadband in rural areas.

Recommendations included:

- Encourage local and regional broadband planning, including communications planning between telecommunications providers and public power districts and cooperatives.
- Explore the creation of broadband cooperatives in unserved and underserved localities.
- Explore ways to make it easier for public entities to lease dark fiber.
- Explore legislation clarifying communications as an approved use for private easements set up for telephone and electric use.
- Encourage local governments to review their rights of way and permitting processes and take steps if necessary to make the processes less burdensome for telecommunications providers.

As HUD guidance is continually developed and disseminated, DED may consider use of CDBG funds for targeted broadband access. At this time, other state resources and/or incentives for public-private partnerships are under consideration for this purpose. At this time, DED does not administer state or other resources for broadband. DED may consider funding broadband planning-only projects with CDBG.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

While there are a number of broadband service providers in Nebraska, there is a continued need for competition to promote affordability and access, as well as choice, in the community. According to the Information Technology and Innovation Foundation, competition is a crucial component of broadband policy in that it pressures providers to be efficient and innovative.¹⁰

¹⁰ <https://itif.org/publications/2019/09/03/policymakers-guide-broadband-competition>

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The State of Nebraska's 2019 Hazard Mitigation Plan did a complete review of the natural hazards in the State of Nebraska and found the following hazard risks:¹¹

- Landslides
- Drought
- Flooding
- Extreme Heat
- Severe Winter Storm
- Severe Thunderstorm
- Tornado
- Wildfire

As an example, the federally declared flood event of 2019 caused major to severe damage to an estimated 1,414 homes, including low income communities located along river pathways and within the 100-year flood plain. Many families do not have the financial resources to mitigate and rebuild, requiring elevating the home or relocating the home outside the floodplain.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

There are increased risks or low income households that may not have the resources necessary to mitigate risks or recover from disasters. The State's plan identified low-income, minority, low mobility, and elderly households as the most vulnerable to the impacts of some of these hazards in the State.

¹¹ <https://nema.nebraska.gov/sites/nema.nebraska.gov/files/doc/hazmitplan2019.pdf>

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Needs Assessment and Market Analysis, which has been guided by the Housing and Community Development Survey and public input, identified six (6) priority needs. These are described below:

- **Households with unmet housing needs:** The State's Housing Priority Need includes the need to respond to regional needs for affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska.
- **Special Needs and LMI Populations:** There are a number of special needs populations in Nebraska that are in need of services. These include, but are not limited to, the elderly, persons with disabilities, persons and persons with HIV/AIDS. This also includes LMI households and the need for employment training opportunities in the State.
- **Homelessness:** The Homelessness Priority Need is intended to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at risk of becoming homeless by distributing Emergency Solutions Grant Program funds and Homeless Shelter Assistance Trust Funds.
- **Economic Development Priority Needs:** The Economic Development Priority need is intended to foster the competitiveness of Nebraska's business and industrial sector, and as a result, assist in economic development of Nebraska's communities and people.
- **Community Development Priority Needs:** The Community Development Program is intended to strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development.
- **Persons with HIV/AIDS:** The Persons with HIV/AIDS Priority Need is intended to ensure appropriate emergency and/or permanent housing and services for people who are homeless or at imminent risk of becoming homeless by distributing funding to a project sponsor in order to meet the needs of persons living with HIV/AIDS.

These Priority Needs are addressed with the following Goals:

Increase Availability of Affordable Housing

Within the Nebraska affordable housing programs, resources will be provided that primarily benefit low to moderate income persons, and extremely low income persons, through affordable housing activities. These activities are completed through resources from CDBG, HOME, HTF, and NAHTF.

Enhance Public Facilities and Infrastructure

The CDBG funding will target activities relating to planning; public works; water/wastewater; emergent threat; and downtown revitalization. A wide variety of activities are funded that primarily serve LMI persons throughout the state.

Encourage Economic Development

The primary goals of the program include: job creation and expansion; and tourism development. A wide variety of activities are funded that primarily serve LMI persons throughout the state.

Support Vital Public Services

The primary goals of the program include: funding public services including employment training opportunities that will primarily benefit LMI persons throughout the state.

Reduce Homelessness

Provide Rapid Rehousing so persons who are homeless can secure permanent housing options which address their needs and encourage stability.

Provide immediate emergency shelter to people who are homeless as a temporary measure until suitable permanent housing can be secured. Emergency shelter participants may include those individuals fleeing domestic violence/sexual assault/stalking/trafficking victims and may serve as a temporary refuge until individuals can return to their residence safely with supports in place.

Assure needed services are provided to people who are at risk of becoming homeless to prevent entry into emergency shelter or other temporary housing.

The goal outcome indicators include ESG for BoS CoC and HSATF for all 6 regions in Nebraska, excluding Lincoln.

Assist Persons with HIV/AIDS

The primary goals of the program help to provide activities that serve persons with HIV/AIDS throughout Nebraska.

These include homeless prevention, public services, and TBRA activities.

The performance indicators associated with each goal may increase or decrease depending on the annual allocation to the State for each of the federal programs.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The State of Nebraska has chosen not to target any particular geographic area for special assistance, but has chosen to allow any non-entitlement community to apply for CDBG funding, dependent on eligible activities and programs, and provides HOME, HTF, ESG, and HOPWA funding throughout the state.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 50 – Priority Needs Summary

1	Priority Need Name	Households with unmet housing needs
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Individuals Families with Children Families impacted by natural disasters
	Geographic Areas Affected	Statewide
	Associated Goals	Increase Availability of Affordable Housing
	Description	<p>The State's Housing Priority Need includes the need to respond to regional needs for affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska. This Priority Need includes five Objectives that have been developed in order to meet the Housing Priority and include:</p> <ul style="list-style-type: none"> • Promote additional affordable rental housing and preservation of affordable rental housing in selected markets. • Promote housing preservation by improving the quality of Nebraska's existing affordable housing. • Promote additional households into homeownership by expanding affordable homeownership opportunities. • Enhance statewide understanding of fair housing law through outreach and education. • Support the repair of homes damaged by a natural disaster <p>The housing objectives will be accomplished through the use of CDBG, HOME, HTF, and NAHTF resources. A portion of CDBG funds will be used for owner occupied rehabilitation activities and will be aimed at serving persons at or below 80% of the Area Median Income. HOME funds will be utilized for rental housing development through projects developed in conjunction with LIHTCs and acquisition, rehabilitation, and resale activities, also known as Purchase, Rehab, Resale (PRR); new construction; and rental rehab for those persons at or below 80% developed in through Community Housing Development Organization (CHDO) projects. Additional objectives will also be accomplished through the utilization of NAHTF resources in which rental; homebuyer; owner occupied rehabilitation; non-profit operating assistance; and education and outreach programs will serve persons throughout the state. NAHTF funds housing up to 120% of the Area Median Income.</p>

	Basis for Relative Priority	Priority based on the Needs Assessment, Market Analysis, survey, and public input.
2	Priority Need Name	Special Needs and LMI Populations
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Persons with Physical Disabilities Persons with HIV/AIDS and their Families Mentally Ill Chronic Substance Abuse Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Statewide
	Associated Goals	Support Vital Public Services
	Description	There are a number of special needs populations in Nebraska that are in need of services. These include, but are not limited to, the elderly, persons with disabilities, persons and persons with HIV/AIDS. This also includes LMI households and the need for employment training opportunities in the State.
	Basis for Relative Priority	Priority based on the Needs Assessment, Market Analysis, survey, and public input
3	Priority Need Name	Homelessness
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Statewide
	Associated Goals	Reduce Homelessness

	Description	<p>The Homelessness Priority Need is intended to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at risk of becoming homeless by distributing Emergency Solutions Grant Program funds and Homeless Shelter Assistance Trust Funds.</p> <p>The main objectives that have developed for the Homeless Services Priority include providing appropriate shelter and/or housing to people who are homeless and/or at risk of becoming homeless and providing needed services to people who are homeless and/or at risk of becoming homeless.</p> <p>These objectives will be accomplished through ESG and HSATF resources provided to DHHS.</p> <p>ESG and HSATF resources will be used for a variety of activities that include:</p> <ul style="list-style-type: none"> • Rapid Re-Housing • Homelessness Prevention • HMIS • Emergency Shelter • SSI/SSDI Outreach, Access and Recovery Case Managers • Legal Services for individuals experiencing or at risk of homelessness • CoC Planning Grant Match <p>Nebraska Homeless Assistance Program priorities include strategies that promote self-sufficiency; strategies that address a CoC approach to providing shelter and services; coordination of operations, services and programs; and prevention and rapid re-housing activities.</p>
	Basis for Relative Priority	Priority based on the Needs Assessment, Market Analysis, survey, and public input
4	Priority Need Name	Economic Development Priority Needs
	Priority Level	High
	Population	Extremely Low Low Moderate Non-Housing Community Development
	Geographic Areas Affected	Statewide
	Associated Goals	Encourage Economic Development

	Description	<p>The Economic Development Priority need is intended to foster the competitiveness of Nebraska’s business and industrial sector, and as a result, assist in economic development of Nebraska’s communities and people. The objectives that have been created to meet this priority include: promote retention and expansion of existing businesses in Nebraska; investing in public facilities and improvement activities; invest in effective and affordable tourist attractions; and undertake planning activities related to economic development projects.</p> <p>These objectives will be accomplished through CDBG resources that will be utilized for a number of activities that include:</p> <ul style="list-style-type: none"> • Loans to for-profit businesses • Public facilities (infrastructure) projects • Job training grants to for-profit businesses • Speculative building projects or speculative industrial park projects • Short-term interim financing
	Basis for Relative Priority	Priority based on the Needs Assessment, Market Analysis, survey, and public input
5	Priority Need Name	Community Development Priority Needs
	Priority Level	High
	Population	Extremely Low Low Moderate Non-Housing Community Development
	Geographic Areas Affected	Statewide
	Associated Goals	Enhance Public Facilities an Infrastructure
	Description	<p>The Community Development Program is intended to strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development. These programs include: Planning; Public Works; Water/Waste Water; and Downtown Revitalization. CDBG funds will be utilized for projects within the program categories.</p>
	Basis for Relative Priority	Priority based on the Needs Assessment, Market Analysis, survey, and public input
6	Priority Need Name	Persons with HIV/AIDS
	Priority Level	High
	Population	Persons with HIV/AIDS and their Families Persons with HIV/AIDS
	Geographic Areas Affected	Statewide

Associated Goals	Assist Persons with HIV/AIDS
Description	<p>The Persons with HIV/AIDS Priority Need is intended to ensure appropriate emergency and/or permanent housing and services for people who are homeless or at imminent risk of becoming homeless by distributing funding to a project sponsor in order to meet the needs of persons living with HIV/AIDS.</p> <p>The main objective that has been developed for the HOPWA Priority is to provide housing assistance, and related supportive services, to low income persons with HIV/AIDS and their families to enable those persons to achieve stability in housing, reduce the risks of homelessness, and increase access to healthcare.</p> <p>The HOPWA objective will be accomplished through HOPWA resources provided to the Department of Health and Human Services. The HOPWA Program will coordinate with the project sponsor in order to serve persons living with HIV/AIDS within Nebraska.</p> <p>HOPWA resources will be used for a variety of activities that include:</p> <ul style="list-style-type: none"> • Tenant Based Rental Assistance (TBRA) • Short-Term Rent and Mortgage Assistance • Supportive Services • Permanent Housing Placement • Housing Information Services • Resource Identification <p>HOPWA services are prioritized to provide outreach to chronically homeless and homeless persons, and their families, living with HIV/AIDS in order to help address those persons housing and supportive/medical needs.</p>
Basis for Relative Priority	Priority based on the Needs Assessment, Market Analysis, survey, and public input

Narrative (Optional)

The State’s Priority Needs are a product of the Needs Assessment, Housing Market Analysis, public input, and survey. These efforts resulted in the priority needs that will be addressed over five years with the goals outlined in Section SP-45.

SP-30 Influence of Market Conditions – 91.215 (b)

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>Nebraska is currently experiencing a shortage of affordable and available rental units for low income and extremely low income households throughout the state.</p> <p>Some 21 percent of households are experiencing cost burdens. With the rising cost of rents more persons are in the need of TBRA.</p> <p>Some resources, through ESG and HOPWA, are available for TBRA, but there is an increased difficulty of providing affordable housing for lower income renters due to reductions in federal resources.</p>
TBRA for Non-Homeless Special Needs	<p>There is the need for non-homeless special needs rental housing assistance throughout Nebraska. Throughout the state there is a lack of sufficient, affordable, and accessible rental housing for elderly and non-elderly persons with disabilities. There is also a shortage of supportive housing for persons with HIV-AIDS; persons with substance abuse; and other special needs categories.</p> <p>In many instances, renter households that include persons with disabilities are more likely than other households to have very low incomes; pay a larger portion of their monthly incomes for rent; and are more likely to live in substandard housing.</p> <p>Overall, more TBRA for the non-homeless special needs population is needed throughout the state. Currently only a portion of HOPWA resources are used for this activity.</p>
New Unit Production	<p>In many communities throughout Nebraska there is the need for additional housing units. This includes rental units and homebuyer units for many income categories, including those who are low income. In some communities the overall supply of residential units is less than the number of jobs available in current markets. This has resulted in employees and employers having to drive several miles in order to get to their places of employment.</p> <p>Overall, as the data indicates, and as is commonly reported to the State by citizens, there is the need for increased residential unit production. HOME HTF, and NAHTF resources are used in these efforts, but a large need still remains.</p>
Rehabilitation	<p>Based on the findings of the Community Needs Survey that was conducted during the completion of the Consolidated Plan it was evident from many respondents of the need for additional residential rehabilitation in Nebraska.</p> <p>Other data provides support for this claim. The aging housing stock requires rehabilitation and the market indicates this need.</p> <p>CDBG, HOME, and NAHTF resources are utilized for these efforts, but more resources are needed to effectively rehabilitate a significant amount of housing units in many communities throughout Nebraska.</p>

<p>Acquisition, including preservation</p>	<p>The State utilizes a portion of HOME, HTF, and NAHTF resources for acquisition, including preservation, which includes a Purchase, Rehabilitation, Resale (PRR) program which acquires residential properties, rehabilitates those properties, and resells them to low income persons throughout the state. These programs do not keep up with the amount of acquisition and preservation needs that are found in many communities.</p> <p>Based on the above mentioned data, the housing stock in Nebraska is aging and there is a continued need to preserve that existing housing stock. This is evident when the State works with Non-Profit housing organizations who work on acquiring and preserving residential units throughout the state, and is evident by the information that the State receives from its Housing Authority partners. Many Housing Authorities have indicated that their supply of residential units need rehabilitation and preservation.</p> <p>Overall, state and federal resources cannot keep pace with the growing need for acquisition and preservation.</p>
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Table 51 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$11,041,449	\$6,805,748	\$5,739,508	\$23,586,705	\$44,165,796

Narrative Description

CDBG resources are provided to units of local government for CDBG-eligible activities. In 2020, the Table: Expected Resources Priority Table identifies the estimated CDBG annual allocation, program income, and prior year resources available to be distributed. The estimated CDBG program income available for distribution is from the CDBG State Revolving Loan Fund (RLF). A portion of the 2020 allocation resources is reserved for state administration and technical assistance funds combined that may not exceed 3% of the total base allocation plus \$100,000 as per 24 CFR 570.489(a). The State will match up to 3% of the total CDBG allocation for the CDBG general administration allocation, which excludes technical assistance funds.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,961,592	\$0	\$3,228,650	\$7,190,242	\$15,846,368

Narrative Description

HOME resources are primarily used for rental development and homebuyer activities. Homebuyer activities include new construction and purchase, rehab, and resale activities. HOME funds may also be allocated toward down payment assistance if paired with a homebuyer activity. State recipients of resources may also receive administrative funds. No less than 15% of resources will be utilized for CHDO-eligible activities. Ten percent of the HOME allocation will be reserved for State Administration. Note: Nebraska has been granted a statutory suspension and regulatory waiver in order to respond to the COVID-19 pandemic to use up to 25% of its 2020 HOME fund allocation towards administrative and planning costs.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$608,401	0		\$608,401	\$2,433,604

Narrative Description

The majority of HOPWA resources leverage with resources from Community Action Agencies and paired with the Ryan White Part B Program. Up to 3% of the HOPWA allocation can be used for state administration. Up to 7% of HOPWA funds will be used for administrative expenses provided to the HOPWA Program Sponsor. The DHHS HOPWA Program will adjust its and their Project Sponsors estimated proposed allocation budgets accordingly as an increase or decrease if and when actual allocation amounts differ from what was proposed.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$1,009,899	0	0	\$1,009,899	\$4,039,596

Narrative Description

ESG resources are allocated to non-profit agencies throughout the state to provide ESG eligible homeless and at-risk of homelessness services for the Nebraska Balance of State CoC. Homeless Shelter Assistance Trust Fund (HSATF) resources will be utilized to supplement ESG activities and provide matching funds. See the Table: Expected Resources Priority Table to view the funding available through the HSATF program. Of the expected ESG allocation, 7.5% will be set aside for state administration to provide technical assistance and program support.

If ESG allocations are lower than anticipated, the same formula for allocating funds to the regions will apply.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$3,000,000	\$0	\$5,130,195	\$8,130,195	\$12,000,000

Narrative Description

HTF resources are primarily used for rental development and acquisition, rental rehabilitation, and operating assistance and operating reserves for extremely low income persons at or below 30% of the Area Median Income. During the 2020 Program Year, the Table: Expected Resources Priority Table highlights the estimated funding available for the HTF program. Funds will be distributed to projects as identified within the AP-30: Methods of Distribution and the HTF Allocation Plan through the following set-asides: LIHTC 9%, Targeted Needs, and Permanent Housing. Each program year, up to 10% of the allocation will be used for state administration. DED adjusted the estimated proposed allocation of HTF to match the actual allocation amounts from HUD. Adjustments may also be made to the Prior Year Resources.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
Other - NAHTF	public - state	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$10,300,000	0	0	\$10,300,000	41,200,000

Narrative Description

The Nebraska Affordable Housing Trust Fund (NAHTF) was established by the (1996) Nebraska Affordable Housing Act (Neb. Rev. Stat. 58-701 through 58-711). The Act, which was adopted to address the state's affordable housing needs, calls for a portion of the documentary stamp tax from Nebraska real estate transactions to be transferred to the NAHTF. These funds are to be distributed to support the provision of decent, affordable housing statewide, to encourage economic development and promote the general prosperity of all Nebraskans. Project activities include homeowner rehabilitation, homebuyer activities, rental housing, and nonprofit technical assistance. The NAHTF resources for the 2020 Program Year will be utilized to further housing programs throughout the state.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
Other - HSATF	public - state	Admin and Planning Financial Assistance Overnight shelter Permanent housing in facilities Permanent housing placement Rapid re-housing (rental assistance) Rental Assistance Services Short term or transitional housing facilities Supportive services Transitional housing	\$1,150,000	0	0	\$1,150,000	\$4,600,000

Table 52 - Anticipated Resources

Narrative Description

The Nebraska Homeless Shelter Assistance Trust Fund (HSATF) is based on a twenty five cent set aside on each \$1,000 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales as established in 1992, LB 1192, 2. The Table: Expected Resources Priority Table identifies the HSATF funding available to the Balance of the State.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG-DR	public - federal	Acquisition Admin and Planning Homebuyer Assistance Housing Multifamily Rental New Construction Multifamily Rental Rehab New Construction for Ownership Public Improvements Public Services	\$0	\$0	\$0	\$0	\$108,938,000

Narrative Description

In early 2019, the State of Nebraska suffered record-breaking damage from severe winter weather, straight-line winds, and its worst flooding event in 50 years, leading to a federal major disaster declaration (DR-4420) under the Stafford Act. Damage from DR-4420 was widespread, leading to disaster declarations in 84 of the State’s 93 counties (and four tribal areas), with the worst damage located in the eastern part of the state.

To support long-term recovery, on July 7, 2021, the State received a \$108,938,000 grant through HUD’s Community Development Block Grant Disaster Recovery (CDBG-DR) program. HUD requires CDBG-DR grantees to submit an Action Plan describing its unmet needs, the programs that will be implemented to address those unmet needs, the method of distribution across those programs, and how the programs and activities will meet the requirements of HUD. As the administrator of these funds, DED, on behalf of the State of Nebraska (grantee), submitted to HUD its CDBG-DR Action Plan pursuant to these requirements. HUD identified the disaster’s most-impacted and distressed (MID) areas, including the counties of Dodge, Douglas, and Sarpy, which will benefit from the greatest concentration of DR-funded investment.

According to published studies, disaster-impacted areas experience an increase to the cost of construction. This can be attributed to concentrated demand for contractors and building supplies. The ongoing ripple of the covid-19 pandemic has exacerbated these issues.

Refer to the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**CDBG**

In order to fulfill the one to one matching requirement to the CDBG administration allocation, the State will provide up to 3% of matching funds. A portion of the 2020 allocation resources is reserved for state administration and technical assistance funds combined that may not exceed 3% of the total base allocation plus \$100,000 as per 24 CFR 570.489(a). The State will match up to 3% of the total CDBG allocation for the CDBG general administration allocation, which excludes technical assistance funds. This amount fulfills the one-to-one matching requirement toward general administration expenditures. Technical assistance expenditures do not require match. The technical assistance is provided by the state for capacity building for local governments and nonprofit organizations. State recipients and sub-recipients may also receive administration funds.

CDBG funds will be also be matched with other local resources as explained within the AP- 30: Methods of Distribution section of the AAP and the 2020 CDBG Application Guidelines (<http://opportunity.nebraska.gov/CDBG>).

HOME

HOME funds will be leveraged with other resources including low income housing tax credits, private equity, and local resources. For FY2020 and FY2021 the Department will be using the Statutory Suspension and Regulatory Waiver available to the state in response to the COVID-19 pandemic of the reduction of matching contribution. In 2022-2024 program years DED's HOME match reserve and/or NAHTF resources will be utilized to meet the HOME 25% match requirement for non-administration funds.

ESG

ESG funds, through the Nebraska Homeless Assistance Program, will be matched with Nebraska Homeless Assistance Trust Fund (HSATF) resources, which well exceeds the 1:1 requirement per 24 CFR 576.201. The Nebraska Homeless Shelter Assistance Trust Fund (HSATF) is based on a twenty five cent set aside on each \$1,000 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales as established in 1992, LB 1192, § 2. Annually, the amount of HSATF funding varies based on tax revenue.

DHHS ability to provide 100% of the match for ESG subrecipients is a benefit to non-profit agencies in order to provide homeless services, particularly in communities that are rural and/or have limited access to private and local funding sources in their communities.

Additionally, some of the NHAP funded subrecipients are awarded HUD CoC funds to provide Permanent Supportive Housing (PSH) housing, Rapid Rehousing, and essential services to individuals and/or are recipients of HUD Veterans Affairs Supportive Housing (VASH) funds to provide services for homeless veterans. Furthermore, several NHAP subrecipients also receive other federal funds (e.g. VOCA, VAWA, FVSPA, SAMSHA) and other state, foundation and private resources. These funds are utilized in tandem with the NHAP funds to provide a continuum of services that meet the array of needs of homeless individuals across the State. The Nebraska Homeless Shelter Assistance Program coordinates with the Balance of State, Omaha, and Lincoln CoCs which assists in seamless provision of services to all homeless individuals across the State of Nebraska.

HOPWA

For the HOPWA Program, the majority of leveraging of funds includes other public funding, such as Community Action Agencies, the Ryan White Parts B and C, and the Housing Choice Voucher Program. Leveraging from private funding by the Nebraska AIDS Project-Flowers' Fund provides food, personal care, and transportation. Other funding leveraged include resident rent payments by clients to private landlords. Assistance that HOPWA clients receive from outside resources is entered into the Provide Case Management software program to support completion of the Consolidated Annual Performance and Evaluation Report (CAPER).

HTF

HTF funds will be leveraged with a variety of public and private resources that may include, but will not be limited to; low income housing tax credits, developer equity, construction and permanent financing, partner contributions, and other state and federal resources that may be available in order to create successful HTF projects.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its Consolidated Plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Nebraska Department of Economic Development (DED)	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State
Nebraska Department of Health and Human Services	Government	Homelessness Rental	State
Nebraska Balance of State Continuum of Care	Non-profit organizations	Homelessness	Region
Region 1 Panhandle	Other	Homelessness Non-homeless special needs	Region
Region 2 North Central	Other	Homelessness Non-homeless special needs	Region
Region 3 Southwest	Other	Homelessness Non-homeless special needs	Region
Region 4 Southeast	Other	Homelessness Non-homeless special needs	Region
Region 5 Northeast	Other	Homelessness Non-homeless special needs	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Omaha	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
City of Lincoln	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
City of Bellevue	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Units of General Local Government	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Non-Profit Housing Providers	Non-profit organizations	Homelessness Ownership Public Housing Rental	State
For-Profit Housing Developers	Developer	Homelessness Ownership Rental	State
Financial Institutions	Private Industry	Economic Development Homelessness Non-homeless special needs Ownership Rental neighborhood improvements public facilities public services	State

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Nebraska Regional Officials Council (NROC)	Other	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State
Economic Development Districts (EDDs)	Other	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State
Nebraska Housing Developers Association (NHDA)	Non-profit organizations	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Council of State Community Development Agencies (COSFDA)	Non-profit organizations	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Nation
Non-Profit Homeless Service Providers	Non-profit organizations	Homelessness	State
Nebraska Commission on Housing and Homelessness (NCHH)	Non-profit organizations	Homelessness Ownership Rental	State
Lincoln Homeless Coalition (Lincoln’s Continuum of Care)	Non-profit organizations	Homelessness	Jurisdiction
Other Continuums of Care (CoCs)	Non-profit organizations	Homelessness	State
Omaha Housing Authority (OHA)	Non-profit organizations	Homelessness Non-homeless special needs Ownership Public Housing Rental	Other
Other Housing Authorities	Non-profit organizations	Homelessness Ownership Public Housing Rental	State
Nebraska Investment Finance Authority (NIFA)	Other	Homelessness Ownership Rental	State

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
U.S. Department of Agriculture-Rural Development (USDA)	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental public facilities public services	State
Center for Rural Affairs-Rural Enterprise Assistance Project (REAP)	Non-profit organizations	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State
Nebraska AIDS Project (NAP)	Non-profit organizations	Homelessness Rental	State
NHAP Subrecipients (Regions 1-5)	Other	Homelessness Rental	State

Table 53 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The Nebraska Department of Economic Development (DED) and the Nebraska Department of Health and Human Services (DHHS) will manage the service delivery of the State’s federally funded community development and housing programs. CDBG resources administered by the State of Nebraska are only eligible within the non-entitlement areas and do not include Omaha, Lincoln, Bellevue, and Grand Island. These areas are the largest populated areas of the state.

Additional resources are utilized state-wide (including within Omaha, Lincoln, Bellevue, & Grand Island). These resources include: HOME, HTF, ESG, HOPWA, NAHTF, and HSATF resources.

DED oversees the administration and implementation of CDBG, HOME, and HTF grants. DHHS oversees the administration and implementation of ESG and HOPWA grants. In addition, DED oversees the NAHTF program and DHHS oversees the State’s HSATF program. Throughout the year, DED and DHHS meet to ensure consistency in planning, program activities, and program delivery.

Both organizations work directly with sub-recipients and non-entitlement jurisdictions that apply for and receive funding through the State. DED also works with entitlement jurisdictions to administer HOME and HTF projects. Both DED & DHHS also coordinate activities with other federal, state, regional, & local agencies that deliver related housing, community development, and ED programs as mentioned above.

In delivering ESG resources, DHHS consults with the BoS CoC to ensure proper alignment of program activities & to ensure consistency with program delivery. In delivering HOPWA resources, DHHS consults & works directly with the project sponsor to ensure proper alignment of program activities and to ensure consistency with program delivery.

As a result of these coordination efforts, DED and DHHS are able to maximize the efficiency of program design and leverage activities with other programs across the state. In addition, by having competitive applications for CDBG, HOME, HTF, and ESG, the State is able to ensure that funded projects and activities are those that are most needed within communities throughout the state.

Overall, the above mentioned items summarize the strengths in the institutional delivery system.

There are, however, some existing gaps within the institutional delivery system that include: lack of contractors to complete activities (particularly housing related); insufficient resources to carry out activities based on the needs of communities (for CDBG, HOME, HTF, ESG, and HOPWA); and the overall need for greater coordination and education between the service providers and funding institutions. In order to overcome some of these gaps, the State continues to work with its partners to obtain the necessary technical assistance and education regarding other funding opportunities that might be available and to collaborate on projects in order to provide Nebraskans with needed projects and programs.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	

Supportive Services			
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X		X
Other			
	X		X

Table 54 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Service providers that work directly with DED and DHHS, receive funding for public service activities; supportive service activities; and housing are made available to homeless persons and families and persons with HIV/AIDS within the service provider's area of service.

In order to further these efforts, and to ensure services are appropriately targeted with community needs, DHHS consults with the Balance of State Continuums of Care (BoS CoCs). The BoS CoCs recognizes the importance of all components of the Continuum of Care which include: prevention, outreach, intake and assessment, emergency shelter, transitional programs, supportive housing, permanent housing and all other support services which are essential for housing all persons who are homeless or at risk of homelessness in appropriate housing. Through coordination and strategic planning, the BoS CoCs try and target those at highest risk for chronic homelessness to receive support services.

DED consults with homeless service providers through its work with the Nebraska Commission on Housing and Homelessness (NCHH) in order to determine the needed services and assistance for those persons who are homeless or at risk of homelessness. In addition, DED works directly with homeless service providers, and other organizations that serve homeless populations, to determine if there are funds that can be utilized to develop additional housing for the homeless throughout the state.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Through coordinating with the CoCs, the NCHH, homeless service providers, and other service providers (including services for special needs populations), DED and DHHS are able to coordinate the delivery of services for homeless persons and special needs populations. This collaborative effort creates efficiencies in identifying needs and funding to leverage other federal, state, local, and privately funded services in order to provide appropriate services for homeless and other special needs populations. Coordination and collaboration create strengths within the service delivery system.

For ESG, the strength in services is found within the collaborations of the Continua of Care. As the capacity of the BoS CoC continues to mature and the reach of partnerships becomes more inclusive, service delivery will become stronger. An example of this can be seen with the work being done through the CoC and the regional Public Housing (PH) in rural Nebraska to increase the coordination with the Veterans Administration (VA). By increasing access to mainstream housing assistance and targeting VA PH resources, the CoC is able to free up CoC resources to move the system forward to ending chronic homelessness. NHAP's provision of HSATF for SOAR services has strengthened the service delivery system for individuals meeting the definition of 'homeless' or 'at risk of homelessness' who have a mental illness or co-occurring mental illness and substance abuse disorder.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

In developing a strategy to identify and address priority needs, the State conducted a Community Needs Assessment, market analysis, and citizen and stakeholder outreach as part of the Consolidated Plan in order to identify current conditions and to determine the basis for priority needs established within the Plan. The strategy that will be utilized to overcome some of the gaps mentioned above and to strengthen the institutional structure and service delivery system will include the following strategies:

- DHHS, in coordination with the CoCs will work towards the use of a common assessment for homeless prevention services. The assessment will assist agencies in prioritizing those individuals most in need of homeless prevention services.
- DHHS, through the HOPWA Program collaborates with key players in the community to eliminate gaps and build upon strengths. Streamlining and sharing information on existing services with all (clients and providers) is beneficial. Having additional funding, housing assistance, and supportive service programs in general would limit gaps and cyclical behavior patterns exhibited by the HIV/AIDS population being served.
- DED, through coordination with the NCHH, will continue to collaborate with service providers and stakeholders in providing additional education, outreach, and consultation with collaborating agencies, organizations, and service providers. A better understanding of the services that organizations can provide will enhance the service delivery system and ultimately better serve the homeless and special needs populations throughout the state.
- The State, through coordination with the NCHH, will continue to move forward in addressing improvements to the service delivery system through the implementation of the Opening Doors Plan.
- The State will continue to coordinate with other agencies and organizations in order to determine if additional resources are available to assist both homeless and special needs populations.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Availability of Affordable Housing	2020	2024	Affordable Housing	Statewide	Households with Unmet Housing Needs	CDBG: \$7,727,561 HOME: \$19,801,150 National Housing Trust Fund (HTF): \$15,000,000 NAHTF: \$45,000,000	Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 100 Household Housing Unit Homeowner Housing Added: 600 Household Housing Unit Homeowner Housing Rehabilitated: 620 Household Housing Unit
2	Enhance Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Statewide	Community Development Priority Needs	CDBG: \$32,014,182	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 325,000 Persons Assisted Facade treatment/business building rehabilitation: 200 Business
3	Encourage Economic Development	2020	2024	Non-Housing Community Development	Statewide	Economic Development Priority Needs	CDBG: \$12,695,278	Jobs created/retained: 200 Jobs Businesses assisted: 12 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Support Vital Public Services	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Statewide	Special Needs and LMI Populations	CDBG: \$1,103,937	Public service activities other than Low/Moderate Income Housing Benefit: 180 Number of Persons Assisted
5	Reduce Homelessness	2020	2024	Homeless	Statewide	Homelessness	ESG: \$ 5,049,495 HSATF: \$5,250,000	Tenant-based rental assistance / Rapid Rehousing: 750 Households Assisted Homeless Person Overnight Shelter: 9,750 Persons Assisted Homelessness Prevention: 4,725 Persons Assisted
6	Assist Persons with HIV/AIDS	2020	2024	Homeless Non-Homeless Special Needs	Statewide	Persons with HIV/AIDS	HOPWA: \$3,042,005	Tenant-based rental assistance / Rapid Rehousing: 75 Households Assisted Public Service activities other than LMI Housing Benefit 75 Persons Assisted Homeless Prevention: 300 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Disaster Recovery	2020	2024	Households with Unmet Housing Needs Non-Housing Community Development	Statewide	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG-DR: \$108,938,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted Rental units constructed: 231 Household Housing Units Homeowner Housing Added: 129 Household Housing Unit Direct Financial Assistance to Homebuyers: 100 Households Assisted.

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Availability of Affordable Housing
	Goal Description	Goal Description: Within the Nebraska affordable housing programs, resources will be provided that primarily benefit low to moderate income persons, and extremely low income persons, through affordable housing activities. These activities are completed through resources from CDBG, HOME, HTF, and NAHTF.

2	Goal Name	Enhance Public Facilities an Infrastructure
	Goal Description	Goal Description: This Program includes planning; public works; water/wastewater; emergent threat; and downtown revitalization activities. A wide variety of activities are funded that primarily serve LMI persons throughout the state.
3	Goal Name	Encourage Economic Development
	Goal Description	Goal Description: The primary goals of the Program include: job creation and expansion; and tourism development. A wide variety of activities are funded that primarily serve LMI persons throughout the state.
4	Goal Name	Support Vital Public Services
	Goal Description	Goal Description: The primary goals of the Program include: funding public services including employment training opportunities that will primarily benefit LMI persons throughout the state.
5	Goal Name	Reduce Homelessness
	Goal Description	<p>Reduce homelessness by making homelessness rare, brief, and non-recurring</p> <p>Provide Rapid Rehousing so persons who are homeless can secure permanent housing options which address their needs and encourage stability.</p> <p>Provide immediate emergency shelter to people who are homeless as a temporary measure until suitable permanent housing can be secured. Emergency shelter participants may include those individuals fleeing domestic violence/sexual assault/stalking/trafficking victims and may serve as a temporary refuge until individuals can return to their residence safely with supports in place.</p> <p>Assure needed services are provided to people who are at risk of becoming homeless to prevent entry into emergency shelter or other temporary housing.</p>
6	Goal Name	Assist Persons with HIV/AIDS
	Goal Description	<p>Goal Description: The primary goals of the Program help to provide activities that serve persons with HIV/AIDS throughout Nebraska.</p> <p>These include homeless prevention, public services, and TBRA activities.</p>
7	Goal Name	Disaster Recovery

<p>Goal Description</p>	<p>In early 2019, the State of Nebraska suffered record-breaking damage from severe winter weather, straight-line winds, and its worst flooding event in 50 years, leading to a federal major disaster declaration (DR-4420) under the Stafford Act. Damage from DR-4420 was widespread, leading to disaster declarations in 84 of the State’s 93 counties (and four tribal areas), with the worst damage located in the eastern part of the state.</p> <p>To support long-term recovery, on July 7, 2021, the State received a \$108,938,000 grant through HUD’s Community Development Block Grant Disaster Recovery (CDBG-DR) program. HUD requires CDBG-DR grantees to submit an Action Plan describing its unmet needs, the programs that will be implemented to address those unmet needs, the method of distribution across those programs, and how the programs and activities will meet the requirements of HUD. As the administrator of these funds, DED, on behalf of the State of Nebraska (grantee), submitted to HUD its CDGR-DR Action Plan pursuant to these requirements. The State of Nebraska will invest in housing, infrastructure, and planning activities to support local efforts towards long-term recovery from the disaster, including a priority for resiliency. The alignment of state and federal agencies, whose programs are designed towards the common goal of safer and more resilient communities, will be central to the success of mitigation and resiliency efforts. HUD identified the disaster’s most-impacted and distressed (MID) areas, including the counties of Dodge, Douglas, and Sarpy, which will benefit from the greatest concentration of DR-funded investment.</p> <p>According to published studies, disaster-impacted areas experience an increase to the cost of construction. This can be attributed to concentrated demand for contractors and building supplies. The ongoing ripple of the covid-19 pandemic has exacerbated these issues.</p> <p>Refer to the CDBG-DR Action Plan, https://opportunity.nebraska.gov/cdbg-dr/</p>
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Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The State estimates that this will include 945 extremely low-income, 320 low-income, and 630 moderate-income households. The State also estimated it will provide affordable housing to 550 middle-income households with NAHTF.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

Not applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

Plan to remove the ‘troubled’ designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

According to the Housing and Community survey, the top rated barriers to the development of affordable housing are the cost of land or lot, cost of labor, cost of materials, and the Not In My Back Yard (NIMBY) mentality.

Table MA-40.1 Providing Decent and Affordable Housing State of Nebraska Housing and Community Development Survey	
Question	Response
Do any of the following act as barriers to the development or preservation of affordable housing in your community:	
Cost of land or lot	431
Cost of labor	403
Cost of materials	400
Not In My Back Yard (NIMBY) mentality	333
Lack of affordable housing development policies	279
Lack of qualified contractors or builders	258
Construction fees	193
Lack of available land	192
Density or other zoning requirements	147
Lack of other infrastructure	137
Permitting process	137
Permitting fees	126
Building codes	110
Lot size	95
Lack of sewer system	86
Impact fees	83
Lack of water system	63
ADA codes	62
Lack of water	14

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Actions Related to Tax Policy affecting land and other property

The State will continue to evaluate steps to alleviate the property tax burden that is a barrier to affordable housing. The State has previously reviewed the tax structure as it relates to school districts, but will also review other areas of the tax policy that may be revised which reduce property taxes for Nebraskans.

In addition, the State will continue to review the tax policies affecting affordable housing and evaluate the impacts of the legislation under LB356, which revised the method for appraisals made on low income housing tax credit projects that was passed in 2015. The State will review whether the income-approach calculation will reduce the overall taxes on these properties that utilize low income housing tax credits (LIHTCs) and often times also use HOME or HTF or NAHTF resources.

Actions Related to Land Use Controls and Zoning Ordinances

The State, because it has very limited influence on land use controls and zoning ordinances, will continue to work with local governments to utilize good practices in ensuring the local land use controls and zoning

ordinances do not negatively impact affordable housing development, thus removing an additional barrier to affordable housing. One way in which the State will accomplish this is to continue its collaboration with the Nebraska Chapter of the American Planning Association through its participation at the Nebraska Planning and Zoning Association (NPZA) Conference and other planning and zoning related events. Continued collaboration and educational outreach will assist in these efforts.

Actions related to Building Codes

The State will continue to work with local governments in ensuring that any building codes enacted at the local level do not have a negative impact on affordable housing. Efforts are needed to ensure that local building codes do not hamper additional investment for affordable housing throughout the state. The State will accomplish this through collaborating with community and county officials in educating them on the use of solid building code policy that will focus on ensuring safe and decent housing for individuals, including low-income persons, but at the same time implementing policies such as energy efficiency, into the codes.

In addition, the DED will continue to collaborate with the Nebraska Department of Environment and Energy in ensuring that affordable housing projects meet the property code standards within their developments.

Actions related to Growth Limits

The State, because it has very limited influence on communities utilizing regulatory barriers which place limits on the number of market rate, rental, and affordable housing that may be located within a given area, will continue to work with local governments in education and utilization of good practices in reducing the negative impacts of growth limits within communities. Education and outreach can be important tools in showing that mixed income developments (both market rate and rent-restricted units) are not harmful to communities, but can create benefits through the income diversity within a community. The State will continue its outreach, which assists in reducing any negative impacts that growth limits may have on affordable housing.

Actions related to Policies Impact Return on Residential Investment

Because the State does not have control of the amount of residential return on investment, as this is determined at the local level when a property is sold or when it is rented, the State has limited actions it can take to create more favorable policies that may impact return on residential investment. The State hopes that through education and outreach with affordable housing providers that a reasonable return on investment can be obtained within the development of affordable housing projects, which will help in reducing the negative impacts a limited return on investment may have on housing development. The State will continue to work with local governments, housing providers, housing developers, and other affordable housing entities in order to help assist in the creation of favorable policies that improve return on residential investment and that will reduce the negative impacts on policies related to this issue.

Actions Related to Other Effects of Public Policy on Affordable Housing and Residential Investment

The State will continue to evaluate additional barriers or constraints to the development of affordable housing that include: lack of housing contractors throughout the state; housing construction costs (including labor and materials); residential home values in certain markets; lack of sufficient rental units in some communities; lack of residential units for homebuyers (both low income and market rate) in many communities; lack of infrastructure for development; and insufficient establishment and enforcement of building codes. Policies related to these must be evaluated as these barriers negatively affect both the

private and public sectors in ensuring that proper affordable housing and residential investment is made available within communities throughout the state.

The State will continue to evaluate policies that can be implemented which will work to attract additional residential contractors, particularly those that are willing to construct moderate priced homes in communities. The State will review whether or not there may be policy incentives implemented into the State housing programs that may include: providing zero interest loans to contractors to build residential units; providing low priced or free residential lots for development; and also adjusting the scoring criteria within applications to encourage applicants to use local contractors. This approach could also be implemented at the local level and through education and outreach the State could help influence good decision making and policies that would work toward attracting more residential contractors in many underserved markets throughout the state.

The State will also continue to work with developers and contractors to identify any cost saving measures that might be appropriate to implement in order to save on the cost of materials and labor. Policies related to construction cost savings measures could be evaluated which could include increased collaboration between communities and affordable housing providers that utilize job training in their construction practices and thus are able to provide reduced price homes in communities. Local communities continue to work together to reduce construction and labor costs by creating more economically sustainable economies of scale.

The National Housing Trust Fund (HTF) is an affordable housing production program that will complement existing Federal, State, and local efforts to remove/ameliorate barriers to affordable housing and increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income (ELI) and very low-income households (VLI), including homeless families. Nebraska will use the HTF funding for affordable housing projects through three set-aside programs which will assist to ameliorate barriers to affordable housing for extremely low-income citizens.

Overall, the State will continue to evaluate public policy that may impact the value of residential units in certain markets; the lack of residential units; ways in which to improve residential infrastructure; and code enforcement assistance. All these items will move towards reducing additional barriers to affordable housing.

SP-60 Homelessness Strategy – 91.215(d)

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The State of Nebraska's NHAP funding is focused on assisting the populations with the greatest needs in support of reaching the goal of functional zero of homeless individuals in Nebraska. The Coordinated Entry process utilizes assessment tools which prioritizes those with the highest needs in our communities. The particular population that ranks as the highest risk are those that are unsheltered and/or are chronically homeless as defined by HUD's Final Rule. NHAP will continue to fund Street Outreach (in Omaha and Lincoln with HSATF funds) and Emergency Shelter programs to provide a support system for those individuals that are literally homeless. All individuals who enter homeless programs in Nebraska are provided the opportunity to be referred to the Coordinated Entry system to access permanent housing.

Identifying these individuals has created a more efficient homeless service systems by targeting resources toward those who need them most and helping clients move to appropriate permanent housing programs in an expedited manner. This is a change from the "first come, first served" model to serving those with the greatest risks and needs. In Nebraska, the Coordinated Entry System in the Balance of State has been established to rank those individuals with the highest needs for Permanent Supportive Housing. Other homeless individuals who rank with less intensive needs may qualify for Rapid Rehousing Programs.

A major goal of the Coordinated Entry system is the establishment of a statewide Coordinated Entry list which provides homeless individuals and families to have additional client-choice to relocate to another part of the state in order to move closer to natural supports, employment opportunities or proximity to services.

NHAP will continue to require subrecipient participation in conducting the standardized assessment for every individual that is literally homeless or in emergency shelter and referring to the Coordinated Entry system if the program participant so chooses to do so. NHAP is in partnership with the HMIS provider to receive customized reports regarding entry and exits from homeless assistance programs to monitor NHAP subrecipient compliance with utilizing the Coordinated Entry process.

Additionally, the Coordinated Entry Manager and the public access doors will train other community agencies that encounter unsheltered homeless persons. This includes law enforcement, hospital emergency units, faith communities and other service agencies to continue building symbiotic relationships in efforts to increase the referral networks with CoC provider agencies when they encounter unsheltered persons in need of assistance.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Shelter and Transitional Housing are a critical part of the homeless service system and will remain a needed service throughout the State for a variety of reasons, but not limited to; restrictive participant income eligibility for Rapid Rehousing (RRH) and/or CoC funded programs, short-term housing solutions for working poor experiencing temporary barriers to independent housing due to financial shortfalls, individuals experiencing domestic violence, lack of immediately available fair market housing,

individuals exiting substance abuse treatment centers, youth under the age of 25, and to meet special needs of subsets of program participants.

Shelters provide temporary refuge and often serve as the “front door” or first place of entry to those experiencing homelessness to receive supportive services and access mainstream services. NHAP recognizes the importance that emergency shelters have in connecting those experiencing homelessness with the resources needed to exit homelessness and move to self-sufficiency. Despite these barriers to permanent housing for some individuals, agencies have been making increased efforts to collaborate within their region to provide seamless services from emergency shelter to permanent housing solutions through the utilization of the Coordinated Entry system. The goal of the Coordinated Entry system in the upcoming year is to also include Transitional Housing into the Coordinated Entry system to serve individuals who may need longer term shelter stays and to serve those with priority needs, such as homeless youth, victims of domestic violence and individuals who are recovering from substance abuse.

For NHAP programs funded to support Emergency Shelter and Transitional Housing Programs, performance will be measured based on:

1. Increased bed utilization rate.
2. Decreased average length of stay of the households served in Emergency Shelter/Transitional Housing
3. Increase in the percentage of discharged households to permanent housing.
4. Minimal rates of returns to homelessness

To evaluate these performance measures, NHAP requests data from the HMIS system and has requested customized reports which evaluate the programs on percentage of exits to permanent housing and returns to homelessness. This data will be used to evaluate the effectiveness of programs for funding determination and to address any performance issues with current NHAP subrecipients

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

The State of Nebraska will continue to uphold the expectation that NHAP sub-recipients will coordinate services, utilize the “Housing First” model, and encourage prioritization of Rapid Re-Housing programs towards the end goal ending homelessness in Nebraska. Technical assistance will continue from the State to support the implementation of Outreach and Rapid Re-Housing services through NHAP grant awards towards the end goal of increasing the number of homeless households placed into sustainable permanent housing. NHAP is an active participant of the Coordinated Entry (CE) planning committee and a member of the CE governing body to provide feedback and to ensure inclusion for all homeless and at risk of homeless in our communities.

All NHAP subgrantees have the expectation that they will participate in their local Continuums of Care to coordinate resources to ensure that homeless individuals are identified and provided the appropriate array of services to meet their needs to encourage sustainability. Utilizing the CoC’s Coordinated Entry system allows for standardized assessment to promote placing homeless individuals into appropriate

permanent housing and more effectively targets resources to those most in need. Nebraska is utilizing standardized assessment tools to target the most vulnerable and chronically homeless individuals, youth and families in the State. Higher scores correspond to greater need and are prioritized on the CoC Permanent Supportive Housing (PSH) CE list and those individuals with less intensive needs are placed into permanent housing through Rapid Rehousing programs. Homeless youth are identified for the Transition Aged Youth program that operates within the CE system. Consequently, by identifying chronically homeless and the most vulnerable individuals in the state, active coordination between agencies and then making an expedited and appropriate level of intervention, individuals and families are experiencing homelessness are served in an efficient manner.

NHAP has also directly worked with victim service providers, who are not required to utilize the HMIS system, to promote engagement with the Coordinated Entry system to ensure that the clients served by these types of programs have access to all permanent housing options in conjunction with supportive targeted services. NHAP and the Coordinated Entry manager will continue to train the victim service providers and the state-wide Domestic Violence/Sexual Assault Coalition on the Coordinated Entry processes with special consideration will be provided to protect the confidentiality of individuals utilizing victim services programs.

Nebraska also maintains a Veteran's Coordinated Entry process through the SSVF funding source. Veterans who present at a homeless service provider as homeless or at-risk of homeless are referred to this program for permanent housing opportunities and other supports. In the event of lack of capacity in SSVF, veterans are given priority scoring on the conventional Coordinated Entry list. A major accomplishment for the Nebraska BoS has been certification by the United States Interagency Council on Homelessness (USICH) as achieving functional zero for homeless veterans. The SSVF program is an active participant in the Continuums of Care and will continue to meet the needs of homeless veterans.

Over the course of the next year, NHAP will continue to monitor the length of time households are homeless through HMIS and then establish targets for agencies to assist households into permanent housing utilizing the "Housing First" model. NHAP will monitor subrecipients continued progress on increasing the number of households being placed in permanent housing and provide technical assistance, resources and supports to agencies to promote ending homelessness in Nebraska. NHAP will continue to coordinate with DED and other Federal and State agencies to identify where there is a lack of affordable housing and gaps in services across the State.

It is the goal of NHAP to efficiently and successfully provide permanent housing to the homeless and make all efforts to prevent returns to homelessness. To measure the success of each NHAP funded agency, NHAP is tracking the number of returns to homelessness for individuals/families who have exited to permanent housing in order to provide technical assistance and for funding determinations to promote successful outcomes.

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

Throughout Nebraska, many communities have systems in place funded through NHAP which are targeted towards homelessness prevention. A heavily weighted scoring component was included in the NHAP application to promote collaboration between homeless assistance and mainstream service providers to maximize the funding availability to avoid individuals and families from becoming homeless. These efforts to connect homeless and at risk of homeless to mainstream economic assistance services are evaluated through the NHAP application process.

NHAP funded agencies are required to have a formalized process for referring eligible low-income individuals and families to access self-sufficiency resources. Public benefits such as food stamps (SNAP), TANF, and other benefits offered through DHHS and other community agencies are just a few examples of services distributed state-wide to provide financial assistance to those who are extremely low-income and require assistance in order to stabilize financial situations to promote housing stability.

In addition, a diversion training was provided to all homeless assistance providers throughout Nebraska to promote a model to divert low-income and at-risk of homeless individuals and families from entering homeless systems across the state. The diversion training also included a day for a train-the-trainer program which will allow for the participants to promote this model in local communities. Trainers will conduct sessions on the diversion process, both within their agencies and to community groups. Brochures and other materials will be developed for distribution to agencies and other entities that have contact with homeless and at risk of homeless individuals and families.

In further support of these efforts, NHAP currently sets aside a portion of the HSATF to provide financial support for agencies, designed by their local CoC, to assist individuals who are at risk of homeless or homeless with applying for Social Security Income or Social Security Disability Income benefits through the SSI/SSDI Outreach, Access and Recovery (SOAR) program to improve economic self-sufficiency for eligible candidates. The goal of NHAP is to expand this model with qualifying minor children and transition aged youth, particularly those aging out of foster care and juvenile correctional facilities.

NHAP also provides funding to Legal Aid of Nebraska to assist homeless and at-risk of homelessness individuals with addressing any legal issues that present as barriers to accessing housing. Services include landlord mediation, tenant rights protections, protection/harassment orders, divorce, paternity and custody matters, assistance with accessing public benefits such as child care, SSDI, SSI, and other cash benefits, and resolving consumer debt issues. These funds are also NHAP set-aside funds and not reported in the total HSATF funding available in the AAP.

NHAP will continue to evaluate policies across the CoC regions in order to help low-income individuals and families to avoid becoming homeless, especially extremely low-income families who are being discharged for the publicly funded institutions and systems of care, such as health care facilities, mental health facilities and other youth facilities, and correction programs and institutions. There is a high

expectation that the CoC regions and NHAP subrecipients actively promote and pursue coordination with community providers to connect individuals served with mainstream resources and services.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The State will follow, and monitor grantees to ensure compliance with, the HUD lead-based paint regulations implementing Title X of the Housing and Community Development Act of 1992, as amended. These regulations cover the CDBG, HOME, HTF, ESG, and HOPWA programs, and identify the appropriate type of activity to control lead paint hazards, in projects using federal funds. The \$25,000 abatement threshold in Title X has not been adjusted since it was established, while both construction and rehabilitation costs have escalated. This precludes a number of homes from being rehabilitated because abatement costs make these projects financially unfeasible. The State will further comply with LBP regulations of the EPA and those enacted by the State of Nebraska, including training and licensing requirements for rehabilitation contractors.

The Nebraska Department of Health and Human Services (DHHS), through the Division of Public Health's Lead-Based Paint Program, will coordinate with DED for training, education, and other resources related to lead based paint hazards, and will require that grantees and sub grantees utilize staff and contractors that have the appropriate training and certification.

All ESG subrecipients are required to follow and comply with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act and implementing regulation in 24 CFR part 35, subparts A, B, H, J, K, M and R.

HOPWA has program policies in place that support consumer education and property inspections to ensure quality housing placements. Lead Certification is required. Project Sponsor staff which deliver HOPWA services are trained to complete unit inspections and are required to obtain the Lead Certification from the client.

DED continues to utilize rehab standards that require LBP hazards to be evaluated & the necessary follow up actions to be completed regarding lead based paint.

How are the actions listed above related to the extent of lead poisoning and hazards?

The federal government banned the use of lead-based paint in homes in 1978 after several long-term studies found that lead can damage the nervous system, even before birth. Lead is especially dangerous to children since children absorb more lead than adults and their growing brains are more sensitive to the damaging effects of lead. Homes built before 1940 are 87 percent more likely to contain lead-based paint, homes built between 1940 and 1959 are 69 percent more likely, and home built between 1960 and 1975 are 24 percent more likely to contain lead-based paint.

Of owner-occupied households, there were 68,711 total households with children present, including 13,831 households in homes built earlier than 1939, 24,670 households with children present in homes built between 1940 and 1979, and 30,210 households in homes built in 1980 and later. The above actions aim to meet the current need for mitigating lead based paint hazards.

How are the actions listed above integrated into housing policies and procedures?

Actions to address and reduce LBP hazards are incorporated within the housing activities that are funded by the Department of Economic Development. Each sub-recipient of CDBG, HOME, or HTF funds is required to comply with the LBP regulatory requirements within the programs they administer. Each year, Housing Program Application Guidelines are developed which identify compliance with LBP requirements as one of the elements of the Program. In addition, each sub-recipient is required to develop housing program guidelines for each of their projects and these guidelines also require the compliance with LBP requirements.

The BoS CoC Written Standards for ESG Service Delivery identifies the minimum standard for all shelters and program participant-occupied housing needing to comply with the lead-based paint remediation and disclosure requirements. Additionally, all NHAP subgrants include language which identifies each subgrantee needing to comply and follow the lead-based paint remediation and disclosure requirements.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to 2017 ACS estimates, approximately 9.7% of the population in the non-entitlement areas of Nebraska is below the poverty level. The State of Nebraska recognizes that a single program or emphasis cannot be used to alleviate poverty across the state. The causes of poverty vary widely as do the required actions to reduce the number of poverty-level households. Accordingly, the goals, programs and policies described in this section are intended to work collectively to reduce the number of poverty-level families in the State of Nebraska.

The State, in coordination with non-profit agencies and business, can influence the chances of helping individuals and families move up and out of poverty by supporting local and regional efforts to improve family and individual incomes. The State's goals related to providing decent housing, suitable living environments and expanding economic opportunity can be accomplished through various program strategies and services that will assist in the reduction of families and individuals experiencing poverty.

More specifically, the State will target economic and community development activities to increase the number of high paying jobs in the State. These activities are targeted at low to moderate-income residents to assist these persons in accessing high paying jobs. State and regional projects and initiatives that will impact the employment and economic levels of employees and residents, such as infrastructure improvements to water and sewer systems, community facilities, downtown commercial rehabilitation, and economic development activities, will create a positive economic environment.

The State also provides affordable housing to persons that are low to moderate-income through the housing programs listed in the following section. All beneficiaries of these programs must be low to moderate income individuals. While these programs do not directly reduce the number of poverty-level families in the state, they can alleviate the cost burden of housing for households that are already impoverished.

Details about the programs which assist with these anti-poverty goals and policies are included in the following section.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

Some programs that assist with this anti-poverty strategy include: CDBG, HOME, HTF, ESG, & HOPWA. A summary of the anti-poverty strategy for each of these four programs includes:

CDBG—The primary objective of the program includes assisting low income persons throughout the state & this is completed through utilizing CDBG resources for project activities that include owner occupied rehab for low income homeowners; job creation for low income employees of eligible businesses; infrastructure & community facilities improvements in order to assist those communities who have populations with at least 51% of the residents who are low income; & downtown revitalization & community revitalization projects which include primarily improving low income areas of the community or eliminating slum & blight within a community.

HOME—Program resources are used to create additional low income rental units for persons at or below 60% of the Area Median Income through the State’s coordination with Low Income Housing Tax Credit developments and in assisting low income homebuyers with homeownership opportunities through the State’s Purchase, Rehabilitation, Resale (PRR) programs, new construction, and rental rehab activities completed by eligible CHDOs.

HTF-Program resources are used to create additional ELI rental units for persons at or below 30% of the AMI through the State's coordination with LIHTC developments; through the creation of additional rental units within HTF Targeted Needs Program; and through the rehab of rental units for permanent housing.

ESG— Shelter, homeless prevention and rapid rehousing services and supports provided from NHAP subrecipients can influence the chances of shifting families and individuals to move up and out of poverty. NHAP funded subrecipients assist families in accessing mainstream public assistance programs (such as TANF, Medicaid, SNAP, etc.), support effective stabilized housing situations and provide skills development to allow individuals to obtain better jobs and become self-sufficient. This coordination between NHAP and the funded subrecipients for the delivery of such services will help reach the plan goals for providing suitable living environments and expanded economic opportunity.

NHAP is located within the Economic Support Unit of DHHS. As CSBG, TANF, SNAP and Child Care are located within the same unit it is easy for administration and program staff to coordinate as needed for the delivery of services to the benefit of individuals who are homeless or at risk of becoming homeless.

HOPWA—Program resources serve special needs populations who are in the need of rental assistance of other services.

SP-80 Monitoring – 91.230

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

To ensure that all statutory and regulatory requirements are being met for activities funded with HUD funds, DED and DHHS use various monitoring standards and procedures.

DED and HHS are responsible for ensuring that grantees under the CDBG, HTF, HOME, ESG, and HOPWA Programs carry out projects in accordance with both federal and State of Nebraska statutory and regulatory requirements. In most cases, these requirements are set forth in the grant contract executed between the State and the Grantee. The State provides maximum feasible delegation of responsibility and authority to grantees under the Programs. Whenever possible, deficiencies are rectified through constructive discussion, negotiation and assistance.

CDBG

DED conducts two basic types of monitoring, off-site monitoring (also known as desktop monitoring), and on-site monitoring. DED staff regularly review each project to verify that it is proceeding in the manner set forth in the grant agreement and in accordance with applicable laws and regulations. Desktop monitoring is an ongoing process in which the program representative, responsible for overseeing the grantee's project uses all available information to review the grantee's performance in carrying out the approved project.

This review process enables DED to identify problems requiring immediate attention and to schedule projects for on-site monitoring. Materials used for this review include, but are not limited to: Contract Amendments and/or Extensions to the grant agreement; project status reports, requests for funds (drawdown); final grant closeout reports; DED database review; and other supporting documents.

On-site monitoring is a structured review conducted by the program representative at the location where project activities are being carried out, or where project records are being maintained. An on-site monitoring visit is normally conducted during the course of a project. The monitoring review considers all available evidence of whether a project conformed to an approved grant agreement; whether substantial progress toward program goals had been met; compliance with applicable laws and regulations; and continued capacity of the grantee to carry out the approved project.

Checklists are utilized to ensure that all issues are addressed. DED has CDBG specific checklists based on the types of activities within a given project. The number of times a project is monitored depends upon the issues that may arise during the desktop or on-site monitoring.

HOME and HTF

DED conducts three types of monitoring's for HOME and HTF projects: continual off-site monitoring, on-site monitoring and ongoing on-site monitoring. During the initial contract period all projects receive continual off-site monitoring, DED staff regularly review each project to verify that it is proceeding in the manner set forth in the grant agreement and in accordance with applicable laws and regulations. Off-site monitoring is an ongoing process in which the program representative, responsible for overseeing the grantee's project uses all available information to review the grantee's performance in carrying out the

approved project. This review process enables DED to identify problems requiring immediate attention and to schedule projects for an on-site monitoring review as necessary. Materials used for this review include, but are not limited to: Contract Amendments and/or Extensions to the Grant Agreement; requests for funds (drawdown); DED database review; and other supporting documents. An on-site monitoring is a structured review conducted by the program representative or a member of the Housing Team at the location where project activities are being carried out or where project records are being maintained. All projects receive an on-site monitoring visit prior to a Certificate of Completion being issued. Rental projects funded through the HOME and HTF program with a long-term affordability are subject to continual on-site monitoring visits from the Department. Continual on-site monitoring visits are conducted by a member of the Housing Team to ensure the grantee is continuing to comply with all program regulations.

ESG

DHHS conduct monitoring of the ESG Programs on an on-going basis. Subrecipients are monitored to ensure compliance with ESG regulations and program requirements.

NHAP's general oversight objectives include:

- Reviewing compliance with program regulations
- Avoiding the misuse of program funding
- Identifying technical assistance and training needs

NHAP utilizes the following monitoring process for the ESG program.

NHAP has established a schedule for monitoring which includes on-site monitoring every three years, and periodic financial desk reviews.

On-Site Monitoring

Funded agencies may receive an on-site monitoring review every three years to include:

- A desk review of internal policies to ensure the agency is following ESG regulations
- Interviews with agency staff regarding financial management, data quality, and program procedures.
- Examination of four client files to ensure:
 - Required documentation present that the client meets a homeless category.
 - Evidence that the client's needs were evaluated.
 - Evidence those needs were met appropriately and according to regulations.

Financial Review:

Each calendar quarter NHAP reviews billing requests that are approved for payment.

NHAP selects a minimum of two (2) cost items from a minimum of five (5) subrecipients which were reimbursed by NHAP during the previous quarter.

HOPWA

The HOPWA Program Manager conducts monthly, desktop monitoring of grantee and project sponsor activities. This monthly review includes a data comparison of case management reports from the Provide Case Management system to verify each client listed on the project sponsor's general ledger is also listed on the Provide reports. This ensures client data is accurate in the Provide system for completion of the annual HOPWA Consolidated Annual Performance and Evaluation Report (CAPER). HOPWA requests for emergency rent/mortgage and permanent housing placement assistance are reviewed by the Project Sponsor's compliance supervisor, prior to assistance being provided. This process involves the project sponsor's case management staff submitting client documentation of income, expenses, etc. to the compliance supervisor to substantiate the need for client housing assistance.

Applications for clients receiving tenant-based rental assistance (TBRA) are reviewed by the HOPWA Program Manager prior to assistance being provided. Monthly, a Tenant-Based Rental Assistance ledger is provided by the grantee to the project sponsor to approve client assistance requests and allow for housing checks to be printed and sent to landlords for clients receiving tenant-based rental assistance.

On an annual basis, the HOPWA Program Manager conducts on-site monitoring of client charts at subgrantee main office site. Client charts from the main office are reviewed along with the charts that are brought in from any satellite offices. This review provides quality management assurance that supportive eligibility and service documentation is on file and validates that client program eligibility is being determined appropriately and eligible services are being received. The current data system being used is Provide Database System. This system is monitored regularly to ensure all client/program data fields are accurate and complete. The state is moving to a new system called eCOMPAS in the summer of 2020. This system will be monitored regularly to ensure all client/program data fields are accurate and complete.

2020

ANNUAL ACTION PLAN

STATE OF NEBRASKA ANNUAL ACTION PLAN FOR
HOUSING AND COMMUNITY DEVELOPMENT



July 1, 2020 - June 30, 2021

NEBRASKA

Good Life. Great Opportunity.

DEPT. OF ECONOMIC DEVELOPMENT

NEBRASKA

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2020 Annual Action Plan

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction The following expected resources are an estimation of the allocations amount for the 2020 Program Year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$11,041,449	\$6,805,748	\$5,739,508	\$23,586,705	\$44,165,796

Narrative Description

CDBG resources are provided to units of local government for CDBG-eligible activities. In 2020, the Table: Expected Resources Priority Table identifies the estimated CDBG annual allocation, program income, and prior year resources available to be distributed. The estimated CDBG program income available for distribution is from the CDBG State Revolving Loan Fund (RLF). A portion of the 2020 allocation resources is reserved for state administration and technical assistance funds combined that may not exceed 3% of the total base allocation plus \$100,000 as per 24 CFR 570.489(a). The State will match up to 3% of the total CDBG allocation for the CDBG general administration allocation, which excludes technical assistance funds.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,961,592	\$0	\$3,228,650	\$7,190,242	\$15,846,368

Narrative Description

HOME resources are primarily used for rental development and homebuyer activities. Homebuyer activities include new construction and purchase, rehab, and resale activities. HOME funds may also be allocated toward down payment assistance if paired with a homebuyer activity. State recipients of resources may also receive administrative funds. No less than 15% of resources will be utilized for CHDO-eligible activities. Ten percent of the HOME allocation will be reserved for State Administration. Note: Nebraska has been granted a statutory suspension and regulatory waiver in order to respond to the COVID-19 pandemic to use up to 25% of its 2020 HOME fund allocation towards administrative and planning costs.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$608,401	0		\$608,401	\$2,433,604

Narrative Description

The majority of HOPWA resources leverage with resources from Community Action Agencies and paired with the Ryan White Part B Program. Up to 3% of the HOPWA allocation can be used for state administration. Up to 7% of HOPWA funds will be used for administrative expenses provided to the HOPWA Program Sponsor. The DHHS HOPWA Program will adjust its and their Project Sponsors estimated proposed allocation budgets accordingly as an increase or decrease if and when actual allocation amounts differ from what was proposed.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$1,009,899	0	0	\$1,009,899	\$4,039,596

Narrative Description

ESG resources are allocated to non-profit agencies throughout the state to provide ESG eligible homeless and at-risk of homelessness services for the Nebraska Balance of State CoC. Homeless Shelter Assistance Trust Fund (HSATF) resources will be utilized to supplement ESG activities and provide matching funds. See the Table: Expected Resources Priority Table to view the funding available through the HSATF program. Of the expected ESG allocation, 7.5% will be set aside for state administration to provide technical assistance and program support.

If ESG allocations are lower than anticipated, the same formula for allocating funds to the regions will apply.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$3,000,000	\$0	\$5,130,195	\$8,130,195	\$12,000,000

Narrative Description

HTF resources are primarily used for rental development and acquisition, rental rehabilitation, and operating assistance and operating reserves for extremely low income persons at or below 30% of the Area Median Income. During the 2020 Program Year, the Table: Expected Resources Priority Table highlights the estimated funding available for the HTF program. Funds will be distributed to projects as identified within the AP-30: Methods of Distribution and the HTF Allocation Plan through the following set-asides: LIHTC 9%, Targeted Needs, and Permanent Housing. Each program year, up to 10% of the allocation will be used for state administration. DED adjusted the estimated proposed allocation of HTF to match the actual allocation amounts from HUD. Adjustments may also be made to the Prior Year Resources.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
Other - NAHTF	public - state	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$10,300,000	0	0	\$10,300,000	41,200,000

Narrative Description

The Nebraska Affordable Housing Trust Fund (NAHTF) was established by the (1996) Nebraska Affordable Housing Act (Neb. Rev. Stat. 58-701 through 58-711). The Act, which was adopted to address the state's affordable housing needs, calls for a portion of the documentary stamp tax from Nebraska real estate transactions to be transferred to the NAHTF. These funds are to be distributed to support the provision of decent, affordable housing statewide, to encourage economic development and promote the general prosperity of all Nebraskans. Project activities include homeowner rehabilitation, homebuyer activities, rental housing, and nonprofit technical assistance. The NAHTF resources for the 2020 Program Year will be utilized to further housing programs throughout the state.

Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan
Other - HSATF	public - state	Admin and Planning Financial Assistance Overnight shelter Permanent housing in facilities Permanent housing placement Rapid re-housing (rental assistance) Rental Assistance Services Short term or transitional housing facilities Supportive services Transitional housing	\$1,150,000	0	0	\$1,150,000	\$4,600,000

Table 52 - Anticipated Resources

Narrative Description

The Nebraska Homeless Shelter Assistance Trust Fund (HSATF) is based on a twenty five cent set aside on each \$1,000 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales as established in 1992, LB 1192, 2. The Table: Expected Resources Priority Table identifies the HSATF funding available to the Balance of the State.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG

In order to fulfill the one to one matching requirement to the CDBG administration allocation, the State will provide up to 3% of matching funds. A portion of the 2020 allocation resources is reserved for state administration and technical assistance funds combined that may not exceed 3% of the total base allocation plus \$100,000 as per 24 CFR 570.489(a). The State will match up to 3% of the total CDBG allocation for the CDBG general administration allocation, which excludes technical assistance funds. This amount fulfills the one-to-one matching requirement toward general administration expenditures. Technical assistance expenditures do not require match. The technical assistance is provided by the state for capacity building for local governments and nonprofit organizations. State recipients and sub-recipients may also receive administration funds.

CDBG funds will be also be matched with other local resources as explained within the AP- 30: Methods of Distribution section of the AAP and the 2020 CDBG Application Guidelines (<http://opportunity.nebraska.gov/CDBG>).

HOME

HOME funds will be leveraged with other resources including low income housing tax credits, private equity, and local resources. For FY2020 and FY2021 the Department will be using the Statutory Suspension and Regulatory Waiver available to the state in response to the COVID-19 pandemic of the reduction of matching contribution. In 2022-2024 program years DED's HOME match reserve and/or NAHTF resources will be utilized to meet the HOME 25% match requirement for non-administration funds.

ESG

ESG funds, through the Nebraska Homeless Assistance Program, will be matched with Nebraska Homeless Assistance Trust Fund (HSATF) resources, which well exceeds the 1:1 requirement per 24 CFR 576.201. The Nebraska Homeless Shelter Assistance Trust Fund (HSATF) is based on a twenty five cent set aside on each \$1,000 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales as established in 1992, LB 1192, § 2. Annually, the amount of HSATF funding varies based on tax revenue.

DHHS ability to provide 100% of the match for ESG subrecipients is a benefit to non-profit agencies in order to provide homeless services, particularly in communities that are rural and/or have limited access to private and local funding sources in their communities.

Additionally, some of the NHAP funded subrecipients are awarded HUD CoC funds to provide Permanent Supportive Housing (PSH) housing, Rapid Rehousing, and essential services to individuals and/or are recipients of HUD Veterans Affairs Supportive Housing (VASH) funds to provide services for homeless veterans. Furthermore, several NHAP subrecipients also receive other federal funds (e.g. VOCA, VAWA, FVSPA, SAMSHA) and other state, foundation and private resources. These funds are utilized in tandem with the NHAP funds to provide a continuum of services that meet the array of needs of homeless individuals across the State. The Nebraska Homeless Shelter Assistance Program coordinates with the Balance of State, Omaha, and Lincoln CoCs which assists in seamless provision of services to all homeless individuals across the State of Nebraska.

HOPWA

For the HOPWA Program, the majority of leveraging of funds includes other public funding, such as Community Action Agencies, the Ryan White Parts B and C, and the Housing Choice Voucher Program. Leveraging from private funding by the Nebraska AIDS Project-Flowers' Fund provides food, personal care, and transportation. Other funding leveraged include resident rent payments by clients to private landlords. Assistance that HOPWA clients receive from outside resources is entered into the Provide Case Management software program to support completion of the Consolidated Annual Performance and Evaluation Report (CAPER).

HTF

HTF funds will be leveraged with a variety of public and private resources that may include, but will not be limited to; low income housing tax credits, developer equity, construction and permanent financing, partner contributions, and other state and federal resources that may be available in order to create successful HTF projects.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Availability of Affordable Housing	2020	2024	Affordable Housing	Statewide	Households with Unmet Housing Needs	CDBG: \$4,000,000 HOME: \$6,588,880 HTF: \$7,830,195 NAHTF: \$10,300,000	Rental units constructed: 60 Household Housing Unit Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Added: 120 Household Housing Unit Homeowner Housing Rehabilitated: 124 Household Housing Unit
2	Enhance Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Statewide	Community Development Priority Needs	CDBG: \$13,481,149	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 65,000 Persons Assisted Facade treatment/business building rehabilitation: 40 Business
3	Encourage Economic Development	2020	2024	Non-Housing Community Development	Statewide	Economic Development Priority Needs	CDBG: \$5,322,299	Jobs created/retained: 40 Jobs Businesses assisted: 3 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Support Vital Public Services	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Statewide	Special Needs and LMI Populations	CDBG: \$350,000	Public service activities other than Low/Moderate Income Housing Benefit: 60 Persons Assisted
5	Reduce Homelessness	2020	2024	Homeless	Statewide	Homelessness	ESG: \$934,157 HSATF: \$2,675,000	Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted Homeless Person Overnight Shelter: 1,950 Persons Assisted Homelessness Prevention: 945 Persons Assisted
6	Assist Persons with HIV/AIDS	2020	2024	Homeless Non-Homeless Special Needs	Statewide	Persons with HIV/AIDS	HOPWA: \$572,445	Tenant-based rental assistance / Rapid Rehousing: 15 Households Assisted Public Service activities other than LMI Housing Benefit 15 Persons Assisted Homeless Prevention: 60 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Disaster Recovery	2020	2024	Households with Unmet Housing Needs Non-Housing Community Development	Statewide	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG-DR: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Rental units constructed: 0 Household Housing Units Homeowner Housing Added: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted.

Table 57 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Availability of Affordable Housing
	Goal Description	<p>Goal Description: Within the Nebraska affordable housing programs, resources will be provided that primarily benefit low to moderate income persons, and extremely low income persons, through affordable housing activities. These activities are completed through resources from CDBG, HOME, HTF, and NAHTF.</p> <p>The State estimates it will provide four extremely low income households with assistance with HTF funds.</p>
2	Goal Name	Enhance Public Facilities an Infrastructure
	Goal Description	Goal Description: This Program includes planning; public works; water/wastewater; emergent threat; and downtown revitalization activities. A wide variety of activities are funded that primarily serve LMI persons throughout the state.
3	Goal Name	Encourage Economic Development
	Goal Description	Goal Description: The primary goals of the Program include: job creation and expansion; and tourism development. A wide variety of activities are funded that primarily serve LMI persons throughout the state.
4	Goal Name	Support Vital Public Services
	Goal Description	Goal Description: The primary goals of the Program include: funding public services including youth employment training opportunities that will primarily benefit LMI persons throughout the state.
5	Goal Name	Reduce Homelessness
	Goal Description	<p>Provide Rapid Rehousing so persons who are homeless can secure permanent housing options which address their needs and encourage stability.</p> <p>Provide immediate emergency shelter to people who are homeless as a temporary measure until suitable permanent housing can be secured. Emergency shelter participants may include those individuals fleeing domestic violence/sexual assault/stalking/trafficking victims and may serve as a temporary refuge until individuals can return to their residence safely with supports in place.</p> <p>Assure needed services are provided to people who are at risk of becoming homeless to prevent entry into emergency shelter or other temporary housing.</p>

6	Goal Name	Assist Persons with HIV/AIDS
	Goal Description	<p>Goal Description: The primary goals of the Program help to provide activities that serve persons with HIV/AIDS throughout Nebraska.</p> <p>These include homeless prevention, public services, and TBRA activities.</p>
7	Goal Name	Disaster Recovery
	Goal Description	<p>This goal will be addressed beginning in program year 2021.</p> <p>In early 2019, the State of Nebraska suffered record-breaking damage from severe winter weather, straight-line winds, and its worst flooding event in 50 years, leading to a federal major disaster declaration (DR-4420) under the Stafford Act. Damage from DR-4420 was widespread, leading to disaster declarations in 84 of the State’s 93 counties (and four tribal areas), with the worst damage located in the eastern part of the state.</p> <p>To support long-term recovery, on July 7, 2021, the State received a \$108,938,000 grant through HUD’s Community Development Block Grant Disaster Recovery (CDBG-DR) program. HUD requires CDBG-DR grantees to submit an Action Plan describing its unmet needs, the programs that will be implemented to address those unmet needs, the method of distribution across those programs, and how the programs and activities will meet the requirements of HUD. As the administrator of these funds, DED, on behalf of the State of Nebraska (grantee), submitted to HUD its Action Plan pursuant to these requirements. The State of Nebraska will invest in housing, infrastructure, and planning activities to support local efforts towards long-term recovery from the disaster, including a priority for resiliency. The alignment of state and federal agencies, whose programs are designed towards the common goal of safer and more resilient communities, will be central to the success of mitigation and resiliency efforts.</p> <p>According to published studies, disaster-impacted areas experience an increase to the cost of construction. This can be attributed to concentrated demand for contractors and building supplies. The ongoing ripple of the covid-19 pandemic has exacerbated these issues.</p> <p>For more information refer to the CDBG-DR Action Plan.</p>

AP-25 Allocation Priorities – 91.320(d)

Introduction:

Funding Allocation Priorities

	Increase Availability of Affordable Housing (%)	Enhance Public Facilities and Infrastructure (%)	Encourage Economic Development (%)	Support Vital Public Services (%)	Reduce Homelessness(%)	Assist Persons with HIV/AIDS (%)	Total (%)
CDBG	17%	58%	23%	2%	0	0	100
HOME	100	0	0		0	0	100
HOPWA	0	0	0		0	100	100
ESG	0	0	0		100	0	100
HTF	100	0	0		0	0	100
Other HSATF	0	0	0		100	0	100
Other NAHTF	100	0	0		0	0	100

Table 1 – Funding Allocation Priorities

Reason for Allocation Priorities

Through experience and consultation, the allocation priorities for CDBG, HTF, HOME, and NAHTF have been identified as noted above. The above amounts are approximations based on the percentages of resources that are used for various programs. Note that the above table does not reflect administrative expenses, but does include the CDBG State RLF that is available to eligible projects during the 2020 Program Year.

NHAP’s priority in allocating funding is to ensure ESG and HSATF funds will be utilized to meet our priority need through a comprehensive approach to address the needs of people who are homeless or at risk of homelessness throughout the State of Nebraska. Funding is distributed among the seven geographical regions in Nebraska based on a base amount and HUD’s pro rata needs formula based on population and poverty levels.

In regard to HOPWA, Nebraska’s HOPWA Program budget has funds allocated to budget categories needed in order to serve priority populations (homeless/chronically homeless) including short-term and long-term rent, permanent housing placement, utility assistance and supportive services. Funds have been allocated for the purchase of case management software, and a third party contractor is in the process of preparing an agreement. The HOPWA Program continues to seek additional funds to expand tenant-based rental assistance and to increase client’s hands-on access to employment/job training services. Intensive case management is an important component when serving the priority populations.

How will the proposed distribution of funds will address the priority needs and specific objectives

described in the Consolidated Plan?

The distribution of funds will address the following priority needs as follows:

Households with Unmet Needs Priority Need

This priority need addresses regional needs for affordable, decent, safe, and appropriate housing as a part of balanced economic development in Nebraska. This Priority Need includes five objectives:

- Promote additional affordable rental housing and preservation of affordable rental housing in selected markets.
- Promote housing preservation by improving the quality of Nebraska's existing affordable housing.
- Promote additional households into homeownership by expanding affordable homeownership opportunities.
- Enhance statewide understanding of fair housing law through outreach and education.
- Support the repair of homes damaged by a natural disaster.

CDBG, HOME, HTF, and NAHTF resources will be used to address the objectives mentioned above.

Community Development Priority Need

The Community Development Priority Need was developed to strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development. This Priority Need includes three primary objectives:

- Improve the quality of water and wastewater in Nebraska and assist in developing and financing appropriate infrastructure and facilities for communities and counties that have planned and set priorities for long-term development;
- Invest in quality projects that are identified in a formal community development plan; compliment or support related community investments; leverage maximum private and/or other investment; and have reasonable plans for long-term operation and maintenance; and
- Increase capacity, efficiency, and effectiveness of local planning efforts resulting in long-term development.

The Community Development Program will utilize CDBG resources in order to address the objectives mentioned above.

Economic Development Priority Need

The Economic Development Priority Need addresses the need to foster the competitiveness of Nebraska's business and industrial sector, and as a result, assist in the economic development of Nebraska's communities and people. This Priority Need includes three primary objectives:

- Promote the retention and expansion of existing businesses in Nebraska, and the startup of new businesses in Nebraska, and the immigration of out-of-state businesses relocating or expanding into Nebraska.
- Invest in public facilities and improvement activities that make economic opportunities available to low and moderate income persons.

- Invest in effective and affordable tourist attractions (for profit or nonprofit) in quality communities that will result in visitor spending, generate jobs, and promote long-term economic development.

The Economic Development Program will utilize CDBG resources in order to address the objectives mentioned above.

Special Needs and LMI Populations

The special needs and LMI populations Priority Needs addresses the need for public services for special needs populations and LMI persons in the State. The Public Service Program will utilize CDBG resources in order to address the needs of youth employment training.

Homelessness Priority Need

The Homelessness Priority Need has been developed to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at risk of becoming homeless by distributing Emergency Solutions Grant funds and Homeless Shelter Assistance Trust Fund resources. This Priority Need includes two primary objectives:

- Provide appropriate shelter and/or housing to people who are homeless or at risk of becoming homeless; and
- Provide needed services to people who are homeless or at risk of becoming homeless

The Nebraska Homeless Assistance Program (NHAP) will utilize HUD Emergency Solutions Grant and Homeless Shelter Assistance Trust Funds to address the NHAP Priority Need by funding activities that provide a comprehensive approach to address the needs of people who are homeless or at risk of homelessness throughout the State of Nebraska. These activities are intended to assist in the provision of emergency services to literally homeless persons; prevention and alleviation of homelessness; provide temporary and/or permanent housing for persons who are homeless; and to encourage the development of projects that link housing assistance programs with services to promote self-sufficiency.

Persons with HIV/AIDS Priority Need

The HOPWA Services Priority Need is intended to ensure appropriate emergency and/or permanent housing and services for people who are homeless or at imminent risk of becoming homeless by distributing funds to a project sponsor in order to meet the needs of persons living with HIV/AIDS. This Priority Need assigns one primary objective that includes: Provide housing assistance and related supportive services to low income persons with HIV/AIDS and their families and enable low income persons with HIV/AIDS to achieve stability in housing, reduce risks of homelessness, and increase access to health care. HOPWA resources will be allocated to address the Priority Need and to address this specific objective. In addition, Nebraska's HOPWA Program has identified the majority of homeless/chronically homeless clients have medical concerns and/or are not employed. Placing individuals into housing and connecting them to healthcare are the first-steps when services have been established. Utilizing Permanent Housing Placement and Tenant-Based Rental Assistance has proven to be the best use of HOPWA resources if the person is not eligible for other assistance.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

The Methods of Distribution will be identified for the federal resources: CDBG, HOME, HTF, ESG, and HOPWA. In addition, the two state programs: Nebraska Affordable Housing Trust Fund (NAHTF) and the Homeless Shelter Assistance Trust Fund (HSATF) are referenced within this section.

For more information regarding NAHTF, <https://opportunity.nebraska.gov/nahtf>.

The IDIS eCon Planning Suite System generated the Distribution Methods by State Program Table 12. For purposes of providing the public with a clearer picture of the State’s method of distribution, the following table has been supplemented and reformatted.

Distribution Methods

Table 12 - Distribution Methods by State Program

1	State Program Name:	
	Funding Sources:	
	Describe the state program addressed by the Method of Distribution.	
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	
	Describe how resources will be allocated among funding categories.	
	Describe threshold factors and grant size limits.	
	What are the outcome measures expected as a result of the method of distribution?	

Discussion, Federal Programs, Community Development Block Grant (CDBG)

CDBG funds will be used for activities authorized in Section 155(a) of the amended 1974 Housing and Community Development Act that meet national CDBG objectives. During Program Year 2020, projects will be funded that meet a CDBG National Objectives, benefit to low- and moderate-income persons, elimination of slums and blight and/or urgent need.

CDBG funds are not specifically targeted to areas of minority concentration, but are distributed throughout the state's non-entitlement areas (all areas outside of Omaha, Lincoln, Bellevue, and Grand Island) targeted for activities that serve LMI persons. Since projects funded with CDBG resources typically provide a community-wide benefit, it can be assumed that minority groups benefit equally in the same proportion as they occur in the general population.

To achieve the most effective and efficient use of CDBG funds, DED may, at its discretion, use categorical adjustments. A categorical adjustment allows DED to reserve up to 15% of the total CDBG allocation for use as needed among categories. An adjustment of more than 15% of the total allocation, or the creation or elimination of a category, will be considered a substantial amendment to the AAP, and would require further steps as identified within the Citizen Participation Plan section of the Consolidated Plan. Adjustments may be made for remaining balances within a Category within the last three months following a 12-month Program Year in order to meet the HUD Timely Distribution requirement that requires the CDBG grant amount for a given Federal Fiscal Year to be distributed within a HUD required 15-month time-frame.

For purposes of the 2020 AAP, the overall CDBG Program includes activities within the following goals: increase availability of affordable housing, enhance public facilities and infrastructure, encourage economic development, and support vital public services. The NHAP Program includes activities within the goal reduce homelessness. The HOPWA Program includes activities within the goal Assist Persons with HIV/AIDS. The HTF and HOME Program includes activities within the goal increase availability of affordable housing.

A description and details of each Program and Program Categories are identified in the AP-30 section.

STATE PROGRAM NAME: CDBG – Downtown Revitalization (DTR)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Community Development Priority Need, CDBG funds will be utilized for downtown revitalization projects. The purpose of the Downtown Revitalization Category is to leverage investments that will contribute to the revitalization or redevelopment of downtown infrastructure and develop a greater capacity for growth, addressing health and safety concerns and commercial revitalization within the traditional business centers of our Nebraska communities. This provides a sound basis for fostering local economic development through public and private sector partnerships. This recognizes the importance of the condition and viability of a downtown to increase the community's tax base and cultivates a tangible center for community activity. These projects directly relate to business retention, expansion, and location decisions, but also address public gathering space, recognizing that downtowns reflect the economic core and persona of our communities.

Activities assist communities in their implementation of comprehensive downtown revitalization plan in order to stabilize and enhance clearly defined downtown areas, providing benefit to low- and moderate-income residents of the community or aid in the elimination of substandard or blighted structures and areas in the downtown.

DTR resources are for implementation of the project (i.e., physical improvements to the built environment); such funds become available to the applicant upon successful completion of the requirements of a downtown revitalization predevelopment/planning study. Because responsible, intelligent implementation arises from well-informed planning processes, applicant must make available their DTR study prior to, or along with the application for DTR resources. Use of CDBG resources for planning activities is not required to access DTR resources.

The principle objective for the CDBG program is benefit to low- and moderate-income communities; therefore, priority is given to projects meeting the primary national objective of benefiting low- and moderate-income persons. Activities proposed in applications for CDBG funding in the DTR Category must meet the national objective of benefitting low- and moderate-income persons (through the subcategories LMI Area Benefit and/or, LMI Limited Clientele) or aid in the prevention or elimination of slums or blight in either an area (SBA) or spot basis (SBS). (Urgent Need is not allowable under the DTR Category.)

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below summarizes each selection criteria as a numerical score within the DTR Category. A minimum score of 40 points is required and some criteria require a minimum score as noted below.

Selection Criteria Matrix – DTR Category		
Selection Criteria	Maximum	Threshold Minimum
1. Project Design	50	25
2. Project Readiness	20	10
3. Business & Community Support	10	5
4. Organizational Preparedness	10	
5. Municipal Equalization Fund (MEF) Score Factor	10	-
6. Matching Funds	5	-
7. LMI Benefit	5	-
8. Achievements <i>(Applicant may only earn points as an EDCC or LCC, not both.)</i>	5	
Total	115 points	40 points
On-Site Review <i>(Conducted at DED discretion. NOTE: No points awarded, in supplement of Application only.)</i>		

Refer to Appendix, Section 1.3 –Application Cycle for the application due date for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2–Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).
- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the DTR Category. DTR project activities must be primarily located in the downtown area (i.e., central business district, downtown redevelopment district, etc.) of the applicant community, but may include limited adjacent areas that provide access to the downtown where need and nexus are adequately demonstrated. Where any activity is not identified among the list below, please consult the CDBG Program Manager. Activities may include, but are not limited to, the following:

Facilities: *Community Centers; Senior Centers exclusively for persons aged 62 and over; Nonprofit centers for daycare, dependent care, primary health, and mental health care outpatient clinics (Excluding shelters defined as: hospitals, nursing homes, convalescent homes, battered spouse shelters, shelters for the homeless, halfway houses, group homes, temporary housing); Remodel shelter facilities for the homeless (excludes costs for operation); Accredited public libraries; Neighborhood parks (a new facility/improvement or a quantifiable increase of an existing facility/improvement); Single- or multi-service fire/rescue buildings (Fire trucks are specifically considered “public facilities” and thus eligible); Removal of architectural barriers for accessibility; and Tornado-safe shelters in manufactured home parks (Containing not less than 20 manufactured housing units that are within such proximity of shelter to be of use in a tornado).*

Infrastructure: *Street improvements including curb, gutter, and sidewalk; Storm sewer improvements; Flood control designed to influence or affect the flow in a natural water course such as a river, stream, or lake; Removal of architectural barriers for accessibility; and Drainage improvements (e.g. retention ponds or catch basins).*

Other: *Loans to businesses located in the designated downtown business district for façade improvements, which may include energy efficiency improvements; Loans to businesses located in the designated downtown business district to improve deficiencies in meeting community codes, which may include energy efficiency improvements; Acquisition, clearance, and code enforcement activities that support other revitalization activities; Historic restoration, rehabilitation, and preservation for physical structures and infrastructure in a defined downtown business district; etc.*

Note: *Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.*

- ***Applicant has no significant, unresolved audit finding***
- ***Applicant has no legal actions underway that may significantly impact its capacity***
- ***Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan***
- ***Applicant has adopted an authorizing participation resolution***
- ***Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED***
- ***Applicant is current with all reporting requirements:*** For example, semi-annual project status reports, closeout reports, program income reports, audit reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Detailed Matrix – CDBG DTR Category Table to confirm that the application meets the minimum threshold points required to be considered to receive CDBG funding.

Grant Size Limits:

Refer to the below chart:

Downtown Revitalization Category – Key Minimums, Maximums, and Requirements	
Minimum Project Costs	\$250,000
Maximum Project Costs	\$400,000
Local Matching funds	25% of total project costs
General Administration	10% of Project Costs not to exceed \$35,000
Construction Management	\$10,000

Match Requirements:

Proposed match (i.e., local cost-share) must be for CDBG eligible activities directly related to the proposed project(s) or directly benefitting a substantial majority of the LMI persons or families residing within the service area during the grant award period. Under the DTR category, activities require a 25% match.

Match is proportionally injected into the project as CDBG-funded activities are drawn down. The amount of match must be calculated in dollars. In-kind contributions cannot account for more than one-half (12.5%) of matching funds. Therefore, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions. Sweat equity is not allowable to be charged to the grant under any circumstance, which includes local cost-share. Consideration for match will be given for such sources as public and/or private funds, or in-kind services such as materials, labor, or other items that are directly related to the project. However, the local match may be used for projects that demonstrate benefit to the overall downtown revitalization that may not be specific to the project activities proposed for CDBG funding. The amount of match must be calculated in dollars. General Administration and Supporting Project Costs (e.g., Construction Management activities) do not require matching funds.

The local match funded activities may benefit the overall downtown revitalization effort while not being specific to the project activities proposed for CDBG funding. For example, where the application proposes commercial rehabilitation, a grantee may inject local matching funds into a sidewalk or sewer system improvement. Such improvements would ideally be within the downtown area and in proximity of the CDBG funded activities, but could be adjacent to or otherwise benefit low- and moderate-income persons. Best practice is to match DTR-funded activities. Activities benefiting from matching funds, not specific to the CDBG-funded project activities, shall be thoroughly described in the application and may be further negotiated as a part of the contract special conditions.

What are the outcome measures expected as a result of the method of distribution?

Through CDBG resources, communities will be improved throughout the state through the increased accessibility, viability, and sustainability of downtown areas.

STATE PROGRAM NAME: CDBG – Economic Development (ED)

Funding Sources:

CDBG funds and CDBG State RLF

Describe the state program addressed by the Method of Distribution.

Within the Economic Development Priority Need, CDBG funds will be utilized for economic development projects. The objective of the Economic Development (ED) category is to assist businesses which expand the state’s economic base and which create quality jobs principally benefiting employees in the low-to-moderate income levels.

CDBG funds will be utilized within the Economic Development Priority Need by a local unit of government for providing communities and counties with resources to assist businesses which expand the state’s economic base and which create quality jobs principally benefiting LMI employees and made available under the LMI CDBG National Objective criteria.

In addition, the CDBG State RLF objective is to provide adequate financing for local development to ensure Nebraska’s economic prosperity and to use all resources in a timely manner. The State is responsible for ensuring that program income at the State and local levels is used in accordance with applicable federal laws and regulations. Program income for the state’s program under the ED category is regulated by the provisions of 24 C.F.R. §570.489(e). Refer to the Appendix.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the ED Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategory LMI Area Benefit, LMI Limited Clientele, LMI Jobs).

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below describes each selection criteria as a numerical score within the ED Category. The maximum number of points available within any application is 110 points. A minimum score of 25 points is required overall.

Selection Criteria Detailed Matrix – ED Category		
Selection Criteria	Maximum	Threshold Minimum
1. CDBG Funding Utilization	35	-
2. Community Impact and Investment	30	-
3. Business Factors	40	-
4. Economic Development Certified or Leadership Community	5	-
Total	110 points	25 points

Refer to Appendix, Section 1.3 –Application Cycle for the application cycle for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2–Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).

For a business to be eligible under the Department's CDBG ED category, it must either: 1) be eligible for the Nebraska Advantage Act (unless updated by the Nebraska Legislature) as described below or 2) be a for-profit business that provides essential goods or services to local governments' residents of which at least 51% of the benefitting residents qualify as low- and moderate income (LMI).

1) Nebraska Advantage Qualified Businesses: Meet the definitional criteria to be a "qualified business" as defined in the Nebraska Advantage Act, as that Act exists at the time an eligibility determination is made. The following listing summarizes the categories of businesses considered to be a "qualified business" under the Nebraska Advantage Act. The statutory text and regulatory interpretations by the Department of Revenue will prevail in the event of an interpretive conflict with these guidelines. "Qualified Businesses" are those engaged in any one (or combination) of the following:

- Research and development
- Manufacturing
- Data processing
- Telecommunications
- Insurance
- Financial Services
- Distribution
- Storage/Warehousing
- Transportation
- Headquarters (administrative)
- Data Centers
- Scientific Testing

- Targeted export services (75% of sales outside Nebraska or to the U.S. Government: software development; computer systems design; product testing services, guidance or surveillance systems; technology licensing)

2) Essential Goods or Services Business: For profit businesses that provide essential goods or services needed by, affordable to, and benefitting low- and moderate-income residents.

- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the ED Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Loans to for-profit businesses (through the applicant community) for a variety of business purposes; Public facilities (infrastructure) projects undertaken by applicant communities for economic development purposes, where a benefiting business agrees to locate or expand premised on the infrastructure improvements and agrees to create jobs for LMI persons.

Note: *Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.*

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**
- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**
- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**
- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, closeout reports, program income reports, audit reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Detailed Matrix – CDBG ED Category Table to confirm that the application meets the minimum threshold of 25 points required to be considered to receive CDBG funding.

Grant Size Limits:

Refer to the below chart:

Economic Development Category – Key Minimums, Maximums, and Requirements	
Maximum CDBG Project Costs	\$1,000,000
Minimum CDBG Project Costs	\$125,000
General Administration	10% of Project Costs, not to exceed \$10,000
Construction Management	\$10,000
Local Matching Funds	100% of Project Costs
Public Benefit Standards per FTE – Maximum	\$35,000
Public Benefit Standards for goods/services	Minimum: \$350 per LMI person served Maximum: \$1,000 per LMI person served
Minimum Hourly Rate	\$12.50

Match Requirements:

Proposed match must be for CDBG eligible activities directly related to the proposed project(s). Under the ED category, activities require a 1:1 match.

Match is proportionally injected into the project as CDBG-funded activities are drawn down. The amount of match must be calculated in dollars. Note that the matching requirement for public facilities (infrastructure) projects undertaken for economic development purposes cannot be met using the benefited business' investment, e.g., the construction of a new plant, but rather must come directly from the applicant community, and the matching funds must be invested in the infrastructure project.

What are the outcome measures expected as a result of the method of distribution?

Through the ED Category, additional jobs will be created or retained throughout the state, which will create additional opportunities for Nebraskans, particularly those who are low and moderate income persons.

STATE PROGRAM NAME: CDBG – Emergent Threat (EM)

Funding Sources:

CDBG State RLF

Describe the state program addressed by the Method of Distribution.

Within the Community Development Priority Need, CDBG State RLF will be used to assist local units of government with situations that pose a serious and immediate threat to public health, safety, or welfare. Priority is given to those projects that are meeting the emergent threat criteria. All activities proposed in applications for CDBG funding in the EM Category must meet the national objective of benefitting low- and moderate- income persons (through the subcategories LMI Area Benefit, LMI Limited Clientele), aid in the prevention or elimination of slums or blight in either an area (SBA) or spot basis (SBS), and/or through urgent need (UN).

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Local units of government must submit a pre-application to DED. Pre-applications are accepted any time during the year. DED will determine whether the community and project are eligible for funding. This determination may be made in consultation with appropriate federal, state and/or local agencies. If the pre-application meets the requirements, DED will invite the local unit of government to submit a full application. Full applications are reviewed on a quarterly basis by DED. DED will issue a notice of approval to those applicants who demonstrate a need, eligible CDBG activity, and meet the CDBG national objective.

The applications must be signed by the chief elected official and must identify how the proposed project meets and/or addresses all of the following:

- A threat must exist to health, safety, or community welfare that requires action. The threat resulted from unforeseeable and unavoidable circumstances or events (e.g., flood, tornado, fire, etc.);
- The project must meet one of the three national objectives of CDBG;
- It must be an eligible CDBG activity;
- No known alternative project or action would be more feasible than the proposed project;
- Reasonable funding summary, including:
 - Identification the major project delivery costs. (e.g., real property acquisition, legal expenses, architectural and engineering fees, project inspection fees, site work, demolition and removal, construction, equipment, etc.) and
 - Indicate the local, state, or federal funds dedicated to the project with clear identification of the CDBG portion.
 - Evidence confirming that other financial resources to alleviate the need were not available.
- Narrative must be responsive to the selection criteria as described in the Matrix below.

The Matrix below describes each selection criteria as a numerical score within the EM Category. The maximum number of points available within any application is 100 points. A minimum score of 30 points is required overall.

Selection Criteria Matrix –EM Category	Maximum	Threshold Minimum
1. Project Need	40	10
2. Project Impact	30	10
3. Project Readiness	30	10
Total	100 points	30 points

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category. No more than 60% of the CDBG State RLF will be disbursed to eligible CDBG EM projects.

Describe threshold factors and grant size limits.

The maximum project cost for CDBG EM activities will be in an amount up to \$450,000 per community or county. The maximum general administration is 10%, not to exceed \$25,000. Construction Management cannot exceed \$10,000.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).
- **Demonstration of threat:**
 - A threat must exist to health, safety or community welfare that requires action;
 - The threat resulted from unforeseeable and unavoidable circumstances or events;
- **Activities are eligible and comply with a CDBG National Objective:**
The activity must meet one of the national objectives: benefit Low to Moderate Income Persons, Aid in the Prevention or Elimination of Slums or Blight, and/or Urgent Need. The following activities are eligible within the EM Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Facilities: Community Centers; Senior Centers exclusively for persons aged 62 and over; Nonprofit centers for daycare, dependent care, primary health, and mental health care outpatient clinics (Excluding shelters defined as: hospitals, nursing homes, convalescent homes, battered spouse shelters, shelters for the homeless, halfway houses, group homes, temporary housing); Remodel

shelter facilities for the homeless (excludes costs for operation); Accredited public libraries; Neighborhood parks (a new facility/improvement or a quantifiable increase of an existing facility/improvement); Single- or multi-service fire/rescue buildings (Fire trucks are specifically considered “public facilities” and thus eligible); and Tornado-safe shelters in manufactured home parks (Containing not less than 20 manufactured housing units that are within such proximity shelter to be of use in a tornado).

Infrastructure: Street improvements including curb, gutter, and sidewalk; Storm sewer improvements; Flood control; and Drainage improvements; Publicly owned water system improvements including, source treatment, storage, and/or distribution improvements; Publicly owned sanitary sewer collection and/or treatment system improvements; and when in support of any of the above activities, acquisition/easements, demolition, and clearance activities may be undertaken.

Note: *Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.*

- ***Applicant has no significant, unresolved audit finding***
- ***Applicant has no legal actions underway that may significantly impact its capacity***
- ***Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan***
- ***Applicant has adopted an authorizing participation resolution***
- ***Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED***
- ***Applicant is current with all reporting requirements:*** For example, semi-annual project status reports, closeout reports, audit reports, program income reports, notification of annual audit reports, etc.

What are the outcome measures expected as a result of the method of distribution?

Through CDBG resources, communities will be improved throughout the state through the increase accessibility, viability, and sustainability of infrastructure and/or facilities.

STATE PROGRAM NAME: CDBG – Youth Job Training (JT)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Support Vital Public Services Priority Need, CDBG funds will be directed toward job training services for youth. Youth Job Training (JT) category activity given priority is employment services for youth that are designed to address a specific special need population. CDBG funds will be awarded to a local unit of government in order to provide communities and counties with resources to assist local school districts to further equip youth with the necessary skills to become a successful addition to the labor force. This program benefits students within LMI households.

In order to participate in this funding opportunity, the local unit of government grantee and the sponsoring school district are required to participate in the Nebraska Jobs of America’s Graduates (JAG) Program. The Nebraska JAG Program is supported by the Nebraska Department of Labor. The Nebraska JAG program is designed for “at risk” youth from households to help young people stay in school through graduation, pursue postsecondary education, and secure quality entry-level jobs leading to career opportunities.

By participating in the Nebraska JAG program, the local school districts hires an educator to implement the Nebraska JAG Program curriculum to eligible students. Eligible young people for the Nebraska JAG program must have barriers, as defined by the JAG program that make them more at risk in graduating from high school, pursuing postsecondary education and a successful addition the labor force.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the JT Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Limited Clientele). Student families must be income qualified, and each grantee and sponsoring school district must be able to demonstrate that 51% of the students participating in the Nebraska JAG program are at or below 80% of the Average Medium Income for the county the student and their family reside.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below describes each selection criteria as a numerical score within the JT Category. The maximum number of points available within any application is 100 points. A minimum score of 20 points is required overall.

Selection Criteria Matrix –JT Category	Maximum	Threshold Minimum
1. Project Need	30	
2. Project Readiness	30	
3. Project Impact	10	
4. Sustainability	30	
Total	100 points	20 points

Refer to Appendix, Section 1.3 –Application Cycle for the application cycle for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).

**Note: Eligible applicants must also submit documentation demonstrating that the school district, the Nebraska JAG Program, and if applicable businesses are partners.*

- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the JT Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Employment Training - Assistance to increase self-sufficiency, including literacy, independent living skills, resume writing, job coaching, “how to get and keep a job” training, or training students in a particular field on skill when there is no tie to a specific position or business.

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**
- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**
- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**
- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, closeout reports, audit reports, notification of annual audit reports, program income reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Matrix – CDBG JT Category Table to confirm that the application meets the minimum threshold of 20 points required to be considered to receive CDBG funding.

Only those applicants that rank in the highest priority may be considered for CDBG funds.

Grant Size Limits:

Refer to the below chart for grant size limits.

Youth Job Training Category – Key Minimum, Maximums, and Requirements	
Maximum CDBG Project Cost	\$100,000
General Administration	\$5,000
Matching Funds	Not Required

What are the outcome measures expected as a result of the method of distribution?

Through CDBG resources, students will obtain practical application of work related skills rather than theoretical concepts in order for the student to be employment ready.

STATE PROGRAM NAME: CDBG – Owner Occupied Rehabilitation (OOR)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Housing Priority Need, CDBG funds will be utilized for owner occupied rehabilitation activities that are made available to persons at or below 80% of the Area Median Income. The purpose of the OOR category is to promote housing preservation by improving the quality of Nebraska’s existing affordable housing including homes damaged by the flood events of 2019. This is one of the five objectives as identified within the State’s Consolidated Plan as identified within the Housing Priority Need. The State’s Housing Priority Need includes the need to respond to regional needs for affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the OOR Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Housing).

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below describes each selection criteria as a numerical score within the OOR Category. The maximum number of points available within any application is 140 points. A minimum score of 30 points is required and some criteria require a minimum score as noted below. Priority will be given to projects that address the repair of homes substantially flooded in the 2019 disaster event.

Selection Criteria Matrix – OOR Category		
Selection Criteria	Maximum	Threshold Minimum
1. Need/Impact	30	10
2. Capacity/Collaboration	30	10
3. Readiness	30	10
4. Municipal Equalization Fund (MEF) Score	10	
5. Match	5	-
6. Achievement in EDCC or LCC	5	-
7. Disaster 4420-DR	30	-
Total	140 points	30 points

Refer to Appendix, Section 1.3 –Application Cycle for the application due date for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

A pre-application is required. The pre-application must be submitted to the Department prior to the Department accepting a full application from the applicant.

Threshold requirements must be met prior to review of the full application. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).
- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the OOR Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Rehabilitation (including rehabilitation which promotes energy efficiency) of residential owner-occupied homes; Special projects directed to the removal of material and architectural barriers, which restrict the mobility and accessibility of elderly and handicapped persons; and Payment of reasonable administrative costs related to implementing the program.

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**
- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**
- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**
- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, closeout reports, audit reports, program income reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Detailed Matrix – CDBG OOR Category Table to confirm that the application meets the minimum threshold of 30 points required to be considered to receive CDBG funding.

Grant Size Limits:

Refer to the below chart:

Owner Occupied Rehabilitation Category – Key Minimums, Maximums, and Requirements	
Minimum Project Costs	\$250,000
Maximum Project Costs	\$750,000
General Administration	not to exceed \$20,000
Housing Management	12% of Projects Costs, not to exceed \$50,000
Lead Base Paint	\$1,500 per unit
Local Matching Funds	Optional

Match Requirements:

Match is optional within the OOR category, proposed match must be for CDBG eligible activities directly related to the proposed project(s). Points will be awarded to applicants based on the amount of cash match provided. Match is proportionally injected into the project as CDBG-funded activities are drawn down.

What are the outcome measures expected as a result of the method of distribution?

Through the CDBG OOR Category additional owner-occupied rehabilitation will occur for housing units occupied by LMI persons throughout the state and homes damaged by the 2019 flood events and occupied by LMI families are repaired.

STATE PROGRAM NAME: CDBG – Planning (PP)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Community Development Priority Need, CDBG funds will be utilized for planning projects. The purpose of the Planning Category is to provide communities the opportunity to solve problems and meet citizen needs through an integrated community planning process that assesses community development needs, develops options for meeting those needs, and packages work plans or otherwise carries out strategic processes that provide the framework for successful projects directing resources toward State priorities.

Successful efforts shall involve strategic planning, implementation, monitoring, and evaluation. The outcome of a successful planning process will ultimately provide information and data that will be used in future planning and implementation efforts. Successful projects arise from effective efforts to involve stakeholders and gain their support throughout the process.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the PP Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit, LMI Limited Clientele, LMI Housing) or aid in the prevention or elimination of slums or blight in either an area (SBA) or spot basis (SBS).

No Preliminary Engineering Reports (PERs) that are prepared in anticipation of Water/Wastewater Advisory Committee (WWAC) funding will be funded through the PP Category. PERs that are proposed without the intention of going through the WWAC process may be funded.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below describes each selection criteria as a numerical score within the PP Category. The maximum number of points available within any application is 115 points. A minimum score of 45 points is required and some criteria require a minimum score as noted below. Preference is given to project proposals that demonstrate a comprehensive approach. Priority is given to projects meeting the primary national objective of benefiting low- and moderate-income persons.

Selection Criteria Matrix – PP Category		
Selection Criteria	Maximum	Threshold Minimum
1. Project Need	30	15
2. Project Impact	30	15
3. Project Readiness	30	15
4. MEF Score	10	-
5. LMI Benefit	5	-
6. Match	5	-
7. Sustainability	5	-
Total	115 points	45 points

Refer to Appendix, Section 1.3 –Application Cycle for the application due date for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).

Eligible local governments may individually or jointly apply and receive more than one grant per application cycle in the Planning Category. The applicant local government in multi-jurisdictional application must also be a direct participant in the study/project. The applicant local government cannot serve only as a pass through for CDBG funds or only as the general administrator of the study/project. All municipalities must be involved with the same project, which addresses a common issue. The product can, however, be packaged to meet individual municipal or county needs. There must be a product for the regional study and each municipality or county may have its own product that addresses local recommendations, strategies, or needs as an example.

- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the PP Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Community Strategic Planning such as, comprehensive plans, downtown revitalization, neighborhood revitalization, environmental and/or sustainability, brownfield revitalization, needs assessment, citizen participation, and fiscal management; Analysis of Impediments (AI) or barriers to Fair Housing Choice; Functional, Analytical, or Special Studies such as - housing; infrastructure; community or regional economic development; land use, zoning, or other related regulatory measures; feasibility; main street improvement district; energy conservation; and transportation, which includes walking/biking/multi-modal studies; and Environmental, Heritage Tourism, and Historic Preservation Studies.

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**

- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**
- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**
- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, program income reports, closeout reports, audit reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Matrix – CDBG PP Category Table to confirm that the application meets the minimum threshold points required to be considered to receive CDBG funding.

Grant Size Limits:

Refer to the below chart:

Planning Category – Key Minimums, Maximums, and Requirements	
Minimum Project Cost	\$20,000
Maximum: Individual Community, Project Costs	\$50,000
Maximum: Multi-Jurisdictional/Countywide, Project Costs	\$70,000
Local Matching Funds	25% of total project costs
General Administration	10% of Project Costs not to exceed \$3,000

Proposed match must be for CDBG eligible activities directly related to the proposed project(s). Match is proportionally injected into the project as CDBG-funded activities are drawn down. The amount of match must be calculated in dollars. In-kind contributions cannot account for more than one-half (12.5%) of matching funds. Therefore, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions. Consideration for match will be given for such sources as public and/or private funds, or in-kind services such as materials, labor, or other items that are directly related to the project. All activities funded with PP resources, except costs associated with general administration, require a minimum cost-share where the local match must be at least 25% of total CDBG project activity costs.

What are the outcome measures expected as a result of the method of distribution?

Through additional planning, communities and counties will be able to better prepare for potential projects throughout the state. These planning efforts will help provide communities the opportunity to solve problems and meet citizen needs through an integrated community planning process that assesses community development needs, develops options for meeting those needs, and packages work plans or otherwise carries out processes that lead to successful projects that direct resources toward State priorities.

STATE PROGRAM NAME: CDBG – Public Works (PW)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Community Development Priority Need, CDBG funds will be utilized for public works projects. The purpose of the Public Works (PW) Category is to provide for a broad range of investments to communities investing in effective and affordable infrastructure and/or facilities that address strategic long-term developments. This category recognizes the importance of the availability and condition of infrastructure and community facilities. Funded projects shall develop the state’s communities and counties by providing residents with basic infrastructure and/or facilities with the opportunity to maximize energy efficiency and provide a suitable living environment.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the PW Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit, LMI Limited Clientele).

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below describes each selection criteria as a numerical score within the PW Category. The maximum number of points available within any application is 110 points. A minimum score of 55 points is required and some criteria require a minimum score as noted below.

Selection Criteria Matrix – CDBG PW Category Table		
Selection Criteria	Maximum	Threshold Minimum
1. Need & Extent of the Problem	40	25
2. Citizen Participation	15	10
3. Project Impact	15	10
4. Project Readiness	15	10
5. Municipal Equalization Factor (MEF)	10	-
6. Match	5	-
7. LMI Benefit	5	-
8. Achievements	5	-
Total	110 points	55 points

Refer to Appendix, Section 1.3 –Application Cycle for the application due date for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria?

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category. No more than 50% of available funds may be designated for infrastructure projects, the balance of available funds are designated for facility projects. If requests for facility projects are less than the 50%, the infrastructure projects may exceed 50%.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).

NOTE: Eligible applicants may submit one application for facility projects and one application for infrastructure activities during the program year’s application cycle.

- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the PW Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Facilities: *Community Centers; Senior Centers exclusively for persons aged 62 and over; Nonprofit centers for daycare, dependent care, primary health, and mental health care outpatient clinics (Excluding shelters defined as: hospitals, nursing homes, convalescent homes, battered spouse shelters, shelters for the homeless, halfway houses, group homes, temporary housing); Remodel shelter facilities for the homeless (excludes costs for operation); Accredited public libraries; Neighborhood parks (a new facility/improvement or a quantifiable increase of an existing facility/improvement); Single- or multi-service fire/rescue buildings (Fire trucks are specifically considered “public facilities” and thus eligible); Removal of architectural barriers for accessibility; and Tornado-safe shelters in manufactured home parks (Containing not less than 20 manufactured housing units that are within such proximity of shelter to be of use in a tornado).*

Infrastructure: *Street improvements including curb, gutter, and sidewalk; Storm sewer improvements; Flood control designed to influence or affect the flow in a natural water course such as a river, stream, or lake; Removal of architectural barriers for accessibility; and Drainage improvements (e.g. retention ponds or catch basins).*

Note: *Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.*

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**
- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**
- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**

- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, program income reports, closeout reports, audit reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Matrix – CDBG PW Category Table to confirm that the application meets the minimum threshold of 55 points required to be considered to receive CDBG funding.

Grant Size Limits:

Refer to the below chart:

Public Works Category – Key Minimums, Maximums, and Requirements	
Minimum CDBG Project Costs	\$250,000
Maximum CDBG Project Costs	\$400,000
General Administration	10% of CDBG Project Funds Requested (not including General Administration or Construction Management), not to exceed \$25,000
Construction Management (maximum)	\$10,000
Local Matching Funds	25% of Project Costs
Cost per Resident Beneficiary (except for Daycares)	\$3,000
Cost per Daycare Beneficiary	\$10,000

Match Requirements:

Proposed match must be for CDBG eligible activities directly related to the proposed project(s). Match is proportionally injected into the project as CDBG-funded activities are drawn down. The amount of match must be calculated in dollars. In-kind contributions cannot account for more than one-half (12.5%) of matching funds. Therefore, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions. Consideration for match will be given for such sources as public and/or private funds, or in-kind services such as materials, labor, or other items that are directly related to the project.

All activities funded with PW resources, except costs associated with supporting project costs and general administration, require a minimum cost-share where the match must be at least 25% of the CDBG Project Funds requested (not including construction management or general administration).

What are the outcome measures expected as a result of the method of distribution?

Through CDBG resources, communities will be improved throughout the state through the increased accessibility, viability, and sustainability of infrastructure and/or facilities.

STATE PROGRAM NAME: CDBG – Tourism Development (TD)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Economic Development Priority Need, CDBG funds will be utilized for tourism development projects. The purpose of the Tourism Development (TD) Category is to provide investments in effective and affordable tourist attraction facilities to quality communities that are investing in long-term development. This provides a sound basis for assisting tourist attraction projects that have attracted significant financial support and are likely to have long-term positive impacts on their local and regional economies. Tourist attractions projects that serve both a regional and a local economy of community need are a key element in satisfying the state objective. The objective of Tourism Development is to assist tourism development projects that have already attracted significant financial support and are likely to have long-term positive impacts on the local and regional economics.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the TD Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Jobs, LMI Limited Clientele) or aid in the prevention or elimination of slums or blight in either an area (SBA) or spot basis (SBS).

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

The Matrix below describes each selection criteria as a numerical score within the TD Category. The maximum number of points available within any application is 110 points. A minimum score of 30 points is required and some criteria require a minimum score as noted below. Priority is given to projects meeting the primary national objective of benefiting low- and moderate-income persons.

Selection Criteria Matrix –TD Category	Maximum	Threshold Minimum
1. Project Need	20	10
2. Project Impact	20	10
3. Project Readiness	25	10
4. Community Support	25	10
5. Municipal Equalization Fund (MEF) Score	10	-
6. Match	5	-
7. LMI Benefit	5	
Total	110 points	40 points

When more than one application is under review, those ranking highest in competitive order shall be selected for funding subject to the amount of funds available for each priority. Otherwise, an applicant under individual review scored according to the selection criteria and must meet the minimum threshold for consideration for approval.

Refer to Appendix, Section 1.3 –Application Cycle for the application cycle for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).
- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the TD Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Historic Restorations, priority buildings and sites listed on the National Register Historic Places; Scientific and Educational Interpretive Educational Sites & Facilities; Participatory Sports Facilities; Convention Centers; Cultural and Heritage Recreational Sites and Facilities; Supporting Activities that include Removal of Material and Architectural Barriers that Restrict the Mobility and Accessibility to sites/Facilities for the Elderly and Severely Disabled Individuals in Support of Eligible Tourism Activities.

Note: *Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.*

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**
- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**
- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**
- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, program income reports, closeout reports, audit reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Matrix – CDBG TD Category Table to confirm that the application meets the minimum threshold of 40 points required to be considered to receive CDBG funding.

Grant Size Limits:

Refer to the below chart:

Tourism Development Category – Key Minimums, Maximums, and Requirements	
Minimum CDBG Project Costs	\$250,000
Maximum CDBG Project Costs	\$400,000
General Administration	10% of Project Costs, not to exceed \$25,000
Construction Management	\$10,000
Local Matching Funds	25% of Project Costs
Public Benefit Standards per FTE – Maximum	\$35,000 <i>(LMJ Only)</i>
Minimum Hourly Rate	\$12.50

Match Requirements:

Proposed match must be for CDBG eligible activities directly related to the proposed project(s). Match is proportionally injected into the project as CDBG-funded activities are drawn down. The amount of match must be calculated in dollars. In-kind contributions cannot account for more than one-half (12.5%) of matching funds. Therefore, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions. Consideration for match will be given for such sources as public and/or private funds, or in-kind services such as materials, labor, or other items that are directly related to the project.

All activities funded with CDBG resources, except costs associated with supporting project costs and general administration, require a minimum cost-share where the match must be at least 25% of total CDBG project activity costs.

What are the outcome measures expected as a result of the method of distribution?

Additional tourist attractions funded by Tourism Development activities will increase opportunities throughout the state for persons within the communities where the projects are located and for those persons visiting the attractions.

STATE PROGRAM NAME: CDBG – Water/Wastewater (WW)

Funding Sources:

CDBG funds

Describe the state program addressed by the Method of Distribution.

Within the Community Development Priority Need, CDBG funds will be utilized for water/wastewater projects. WW category activities that are eligible for funding are those designed to address and resolve a specific problem/need that will contribute to the revitalization of a community or specific target areas that are contiguous and substantial, where there is a concentration of lower income families. Activities given priority are publicly owned water system improvements including, source treatment, storage and/or distribution improvements; publicly owned sanitary sewer collection and/or treatment system improvements. When in support of any of the above activities, clearance activities may be undertaken.

During the 2020 Program Year, all activities proposed in applications for CDBG funding in the WW Category must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit, LMI Limited Clientele, or LMI Housing).

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Applicants anticipating the use of federal and/or state administered funds in order to finance water or sanitary sewer improvements must submit a pre-application to the Water Wastewater Advisory Committee (WWAC). WWAC is made up of state and federal agencies that include: the Nebraska Department of Economic Development, the Nebraska Department of Environmental Quality, the Nebraska Department of Health & Human Services, and the U.S. Department of Agriculture. The application process includes submitting the pre-application with information regarding a facility plan (FP) or Preliminary Engineering Report (PER) to one of the identified WWAC agency partners.

WWAC reviews the project pre-application materials then advises the applicant which assistance provider(s) can best meet the project funding needs. It is important to note that the DED relies on the ranking systems in this Intended Use Plan (IUP) as their initial step for determining the eligibility of a community for their grants. Drinking water projects must score a minimum of 60 points and clean water projects must meet a minimum of 55 points as described in the IUP. The community, at that time, is also reviewed to determine whether a CDBG National Objective has been met for the State’s CDBG program. If, after a WWAC review, it has been determined that CDBG funds are an appropriate funding source for a community, DED will invite the eligible applicant to apply for a WW funding.

Once an invitation is extended, the eligible applicant has the option to submit a WW application to DED. The Matrix below describes each selection criteria as a numerical score within the WW category. The maximum number of points available within any application is 100 points. A minimum score of 50 points is required and some criteria require a minimum score as noted below.

Selection Criteria Detailed Matrix –WW Category	Maximum	Threshold Minimum
1. Community and Project Need	40	20
2. Project Impact	30	15
3. Project Readiness	30	15
Total	100 points	50 points

When more than one application is under review, those ranking highest in competitive order shall be selected for funding subject to the amount of funds available for each priority. Otherwise, an applicant under individual review scored according to the selection criteria and must meet the minimum threshold for consideration for approval.

Refer to Appendix, Section 1.3 –Application Cycle for the application cycle for this category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Complete information regarding the application criteria are available within the CDBG Application Guidelines. These guidelines will provide specific details on the application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information is available on the DED website at: <https://opportunity.nebraska.gov/program/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for this category.

Describe threshold factors and grant size limits.

Threshold Factors

Threshold requirements must be met prior to review. Applications will not be considered and returned if the following threshold requirements are not met:

- **Applicant is eligible:** Eligible applicants include every Nebraska incorporated municipality or Nebraska county with a population of less than 50,000 and who are not classified as a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island).

NOTE: Eligible applicants may submit one application for wastewater systems and one application for water systems during the program year’s application cycle.

- **Activities are eligible and comply with a CDBG National Objective and State CDBG priority:** The following activities are eligible within the WW Category. Where any activity is not identified among the list below, please consult the CDBG Program Manager.

Publicly owned water system improvements including, source treatment, storage, and/or distribution improvements; Publicly owned sanitary sewer collection and/or treatment system improvements; Installation or replacement of sewer or water service lines on private property may be eligible under LMH national objective only; and when in support of any of the above activities, acquisition/easements, demolition, and clearance activities may be undertaken.

Note: *Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.*

- **Applicant has no significant, unresolved audit finding**
- **Applicant has no legal actions underway that may significantly impact its capacity**
- **Applicant is following a detailed Citizen Participation Plan and Anti-Displacement Plan**

- **Applicant has adopted an authorizing participation resolution**
- **Applicant must have addressed and cleared all compliance problems, if any, from past awards and have had responses accepted by DED**
- **Applicant is current with all reporting requirements:** For example, semi-annual project status reports, program income reports, closeout reports, audit reports, notification of annual audit reports, etc.

If the application meets the above threshold criteria, then the project will be reviewed per the Selection Criteria Detailed Matrix – CDBG WW Category Table to confirm that the application meets the minimum threshold of 50 points required to be considered to receive CDBG funding.

The Drinking Water and the Clean Water State Revolving Funds priority systems will be used to prioritize projects. For more information on the Drinking Water and Clean Water State Revolving Fund priority system please look at the Department of Environmental Quality (NDEQ) website. For Clean Water Revolving Fund please visit <http://www.deq.state.ne.us/Publications+CWSRF>. For Drinking Water Revolving Fund please visit <http://www.deq.state.ne.us/Publications+DWSRF>.

Only those communities that would rank in the highest priority may be considered for CDBG funds. CDBG funds will be considered for the highest ranked communities that are ready to promptly start and complete construction within 24 months. Applicants must have a reasonably projected user fee, including all potential grant funds, exceeding \$20 per household per month.

Grant Size Limits:

Refer to the below chart for grant size limits.

Water/Wastewater Category – Key Minimum, Maximums, and Requirements	
Minimum CDBG Project Costs	\$250,000
Maximum CDBG Project Costs	\$400,000
General Administration	10% of Project Costs, not to exceed \$25,000
Construction Management	\$10,000
Local Matching Funds	25% of Project Costs
Cost per Resident Beneficiary	\$3,000

Match Requirements:

Proposed match must be for CDBG eligible activities directly related to the proposed project(s). Match is proportionally injected into the project as CDBG-funded activities are drawn down. The amount of match must be calculated in dollars. In-kind contributions cannot account for more than one-half (12.5%) of matching funds. Therefore, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions. Consideration for match will be given for such sources as public and/or private funds, or in-kind services such as materials, labor, or other items that are directly related to the project.

All activities funded with CDBG resources, except costs associated with supporting project costs and general administration, require a minimum cost-share where the match must be at least 25% of total CDBG project activity costs.

What are the outcome measures expected as a result of the method of distribution?

Through CDBG resources, communities will be improved throughout the state through the increased accessibility and sustainability of water/wastewater facilities and/or infrastructure.

STATE PROGRAM NAME: HOME Community Housing Development Organizations (CHDO) Operating Program

Funding Sources:

HOME funds

Describe the state program addressed by the Method of Distribution.

Within the Housing Priority Need, HOME funds will be utilized for eligible CHDO operating funds throughout the state and made available to eligible non-profits that are certified/recertified as Community Housing Development Organizations (CHDOs). An organization receiving funds under the CHDO Operating Cycle, cannot also receive a grant under the CHDO Activity set-aside in the same program year.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Eligible applicants include community-based non-profit 501(c)(3), 501(c)(4), or section 905 (subordinate organization of a 501(c) organization) organizations with the provision of decent housing that is affordable to low- and moderate-income persons among the purposes of the organization.

In addition, these organizations must meet and satisfactorily demonstrate the prescribed requirements in the CHDO Certification/Recertification guidelines. DED will designate nonprofit organizations that meet defined criteria as CHDOs. A CHDO is defined in the HOME Investment Partnerships Program Final Rule Subpart A, §92.2.

The HOME CHDO Operating Program will be implemented by the HOME Investment Partnership (HOME) Program within DED. The HOME Program will utilize a separate application cycle titled the "CHDO Operating Cycle." HOME funds will only be available for applicants that are eligible Community Housing Development Organizations (CHDOs).

The CHDO application process will include first reviewing the application and certifying or recertifying an organization as a CHDO. Second, the application will be scored and ranked against all eligible applications. The two highest scoring applications will be recommended for award, with a grant maximum of \$75,000. The application deadline is September 30, 2020.

For FY2020 the Department will be using the Statutory Suspension and Regulatory Waiver available to the state in response to the COVID-19 pandemic for the limits and conditions on CHDO operating expense assistance. The Department has set-aside 8% of their HOME fund allocation for eligible CHDO operating expenses. The Department will permit an eligible CHDO to receive funding to fill operating budget shortfalls, even if the amount exceeds the higher of \$50,000 or 50% of its annual operating budget. Furthermore, a CHDO receiving a CHDO operating grant will not be expected to receive CHDO set-aside funds within 24 months of receiving the operating assistance.

Applicants must receive at least 200 points in order to be considered for funding during the 2020 HOME CHDO Operating Cycle.

Below is the HOME CHDO Operating Cycle Category Scoring Criteria Matrix:

SELECTION CRITERIA MATRIX	
Criteria	Points Possible
Need	200
Impact on Housing Need	100
Sustainability	100
Financial Management	100
Total Possible Points	500

Complete application guideline information will be made available within the CHDO Operating Cycle Application. The Guidelines will provide specific details on the application questions, deadlines for completing the application, threshold requirements, and any other necessary items. This information will be available on the DED website at: <https://opportunity.nebraska.gov/program/home>.

Overall, the information provided above is a summary of the criteria that will be utilized within the HOME CHDO Operating Cycle.

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for the CHDO Operating Application Cycle. The CHDO Application process will include first reviewing the application and certifying or recertifying an organization as a CHDO. Second, the application will be scored and ranked against all eligible applications. The grant maximum is \$75,000.

If there are not enough qualifying applications to fund in the HOME CHDO Operating Cycle, funds may be moved to another HOME funding category to ensure timely allocation of funds.

Describe threshold factors and grant size limits.

Eligible applicants include community-based non-profit 501(c)(3), 501(c)(4), or section 905 (subordinate organization of a 501(c) organization) organizations with the provision of decent housing that is affordable to low- and moderate-income persons among the purposes of the organization.

In addition, these organizations must meet and satisfactorily demonstrate the prescribed requirements in the CHDO Certification/Recertification guidelines. DED will certify/recertify nonprofit organizations that meet defined criteria as CHDOs. A CHDO is defined in the HOME Investment Partnerships Program Final Rule Subpart A, §92.2.

State Certified/Recertified CHDOs will be selected through the HOME CHDO application process. The CHDO Operating Cycle grant maximum is \$75,000.

What are the outcome measures expected as a result of the method of distribution?

The HOME CHDO Operating Program will aid organizations in developing a HOME CHDO eligible homebuyer activity.

STATE PROGRAM NAME: HOME Community Housing Development Organizations (CHDO) Program

Funding Sources:

HOME funds

Describe the state program addressed by the Method of Distribution.

Within the Housing Priority Need, HOME funds will be utilized for eligible CHDO homebuyer activities throughout the state and made available to eligible non-profits that are certified/recertified as Community Housing Development Organizations (CHDOs). An organization receiving funds under the CHDO Activity set-aside, cannot also receive a CHDO Operating Grant in the same program year.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Eligible applicants include community-based non-profit 501(c)(3), 501(c)(4), or section 905 (subordinate organization of a 501(c) organization) organizations with the provision of decent housing that is affordable to low- and moderate-income persons among the purposes of the organization.

In addition, these organizations must meet and satisfactorily demonstrate the prescribed requirements in the CHDO Certification/Recertification guidelines. DED will designate nonprofit organizations that meet defined criteria as CHDOs. A CHDO is defined in the HOME Investment Partnerships Program Final Rule Subpart A, §92.2.

The HOME CHDO Program will be implemented by the HOME Investment Partnership (HOME) Program within DED. The HOME Program will utilize a separate application cycle titled the "CHDO Cycle." HOME funds will only be available for applicants that are eligible Community Housing Development Organizations (CHDOs).

The CHDO Application process will include first reviewing the application and certifying or recertifying an organization as a CHDO. Second, the application will be scored and ranked against all eligible applications. The three highest scoring applications will be recommended for award, with a grant maximum of \$500,000, and organizational operating maximum of \$50,000. The application deadline is September 30, 2020.

Applications must receive at least 200 points in order to be considered for funding during the 2020 HOME CHDO Cycle. Below is the HOME CHDO Cycle Category Scoring Criteria Matrix:

Selection Criteria Matrix	
Criteria	Points Possible
Project Design	150
Need and Impact	100
Project Financing	75
Collaboration	75
Capacity	100
Total Possible Points	500

Complete application guideline information will be made available within the CHDO Program Application. The Application will provide specific details on the Application questions, deadlines for completing applications, threshold requirements, and any other necessary items. This information will be available on the DED website at: <https://opportunity.nebraska.gov/program/home/>.

Overall, the information provided above is a summary of the criteria that will be utilized within the HOME Program CHDO Program Cycle.

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for the CHDO Program Application Cycle. The CHDO Program Application process will include first reviewing the application and certifying or recertifying an organization as a CHDO. Second, the application will be scored and ranked against all eligible applications. The three highest scoring applications will be recommended for award, with a grant maximum of \$500,000, and organizational operating maximum of \$50,000.

If there are not enough projects to fund in the HOME CHDO Program category, funds may be moved to another HOME funding category to ensure timely allocation of funds.

Describe threshold factors and grant size limits.

Eligible applicants include community-based non-profit 501(c)(3), 501(c)(4), or section 905 (subordinate organization of a 501(c) organization) organizations with the provision of decent housing that is affordable to low- and moderate-income persons among the purposes of the organization.

In addition, these organizations must meet and satisfactorily demonstrate the prescribed requirements in the CHDO Certification/Recertification guidelines. DED will certify/recertify nonprofit organizations that meet defined criteria as CHDOs. A CHDO is defined in the HOME Investment Partnerships Program Final Rule Subpart A, §92.2.

State Certified/Recertified CHDOs will be selected through the HOME CHDO Program application process. The grant program costs maximum is \$500,000, and the organizational operating maximum is \$50,000.

What are the outcome measures expected as a result of the method of distribution?

Through the HOME CHDO Program additional housing units will be occupied by LMI persons throughout the state. The additional number of affordable housing units will be quantified within the Consolidated Annual Performance Evaluation Report under the “Housing Program” Goal that is completed after the conclusion of the previous Program Year.

STATE PROGRAM NAME: HOME Rental Program

Funding Sources:

HOME funds

Describe the state program addressed by the Method of Distribution.

Within the Housing Priority Need, HOME funds will be utilized for rental housing (both new construction and rental rehabilitation) through joint application processes between the Nebraska Investment Finance Authority (NIFA) and DED. NIFA will provide an allocation of Low Income Housing Tax Credits (LIHTCs) and DED provides HOME funds to those applicants needing HOME resources for gap financing in order to make their tax credit projects feasible. The tax credit rental development program uses 9% tax credits combined with other resources in order to provide affordable housing to low income persons, at or below 60% of the Area Median Income, throughout the state. All areas of Nebraska are eligible for these rental projects, including the participating jurisdictions of Omaha and Lincoln.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Eligible applicants include community-based non-profit 501(c)(3), 501(c)(4), PHAs, and units of local government. These applicants will partner with rental housing developers in order to complete the joint NIFA/DED application.

NIFA administers the application process that begins with the completion of a Qualified Allocation Plan (QAP). The QAP provides details on the LIHTC allocation process. Further information and details can be found within the QAP at: <https://www.nifa.org/res-dev/application>.

A joint NIFA/DED application is completed online in order for eligible applicants to apply for LIHTCs and HOME resources. The NIFA/DED application includes a variety of detailed selection criteria which include, but are not limited to, site control requirements, evidence of sufficient funding resources, and a market study. Within the joint DED/NIFA LIHTC 9% cycles, a portion of HOME resources will be utilized. There are two cycles within LIHTC 9%. One cycle is the competitive cycle for applicants throughout the State of Nebraska. The other cycle is the CRANE cycle which gives preference to special needs populations as defined within the CRANE application. Applications can be found on NIFA's website at: <https://www.nifa.org/res-dev/application>.

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for LIHTC/HOME. All applicants follow the application cycles and guidelines through NIFA's website found at: <https://www.nifa.org/res-dev/application>. All applicants will need to meet threshold requirements to be considered for funding. After determining that applicants meet threshold, the applications will be scored and ranked against eligible projects. Funding will begin with the highest ranked application and continue down the list until the HOME Funds have been fully awarded. In order to receive HOME Funding, the application needs to receive tax credits from the LIHTC program through NIFA.

If there are not enough projects to fund in the HOME Rental category, funds may be moved to another HOME funding category to ensure timely allocation of funds.

Describe threshold factors and grant size limits.

Only eligible HOME applicants can apply for HOME resources within the NIFA/DED application cycles. Eligible applicants include community-based non-profit 501(c)(3), 501(c)(4), PHAs, and units of local government. A number of Threshold Exhibits are required during the application process that include: architectural plans; an affirmative marketing plan; site control; site visit approval for HOME funded projects; subsidy information; investor letters; financing documentation; development worksheets; and other information (all of which is noted within the NIFA/DED application as mentioned above).

There are no specific HOME grant size limits. However, DED staff will work closely with applicants in order to determine the availability of HOME funds for any given project.

What are the outcome measures expected as a result of the method of distribution?

HOME resources, combined with LIHTCs, will create additional rental housing throughout the state. These additional units will serve low-income persons at or below 60% of the Area Median Income. These additional affordable housing units will remain affordable to low income persons for up to 20 years.

STATE PROGRAM NAME: National Housing Trust Fund (HTF)

Funding Sources:

HTF funds

Describe the state program addressed by the Method of Distribution.

Within the Housing Priority Need, HTF funds will be utilized for rental housing (both new construction and rental rehabilitation) made available to extremely low-income (ELI) persons on an area basis.

Eligible applicants may submit applications based on one of three application types that include:

- Nebraska will reserve a portion of the State’s annual HTF allocation to affordable, multi-family rental projects, single-family rental projects and rental rehabilitation projects in coordination with Nebraska Investment Finance Authority (NIFA) through the joint DED/NIFA application for low income housing tax credit applications within the LIHTC 9% application cycles. This allocation will be referred to as the “LIHTC 9% Set Aside”. Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.
- Nebraska will allocate a portion of the State’s annual HTF allocation for targeted needs housing projects funded with non-LIHTC resources. These projects will help determine how the State can develop smaller scale multi-family rental projects, single-family rental projects and rental rehabilitation projects within areas of the state that are experiencing shortages of available housing for those populations with targeted needs. This allocation will be referred as the “Targeted Needs Set Aside”. Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.
- Nebraska will allocate the remainder of HTF for permanent housing projects for the homeless; persons at risk of homelessness; and other special needs populations. These funds will be made available for multi-family rental projects, single-family rental projects and rental rehabilitation projects within the Omaha CoC, Lincoln CoC and the BoS CoC. This allocation will be referred to as the “Permanent Housing Set Aside”. Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Nebraska will distribute HTF funds by selecting applications submitted by eligible recipients. Eligible recipients include: local or regional non-profit 501(c)(3) or 501 (c)(4) housing or related service organizations; and public housing authorities. In addition, to be eligible for HTF assistance, a recipient must:

1. Make acceptable assurances to the State that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;
2. Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
3. Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and

4. Have demonstrated experience and capacity to carry out an eligible HTF activity as evidenced by its ability to: own, construct, rehabilitate, manage and operate an affordable multifamily rental housing development.

The HTF Allocation Plan is designed to ensure that applicants will have the opportunity to compete for funding to address their unmet rental housing needs where economically feasible. Applicants will need to meet threshold criteria in order to be considered for funding. Applications will be scored on 70 points with equal consideration given to the following categories: Geographic Diversity; Ability to Obligate Funds; Timeliness; Project Based Rental Assistance ELI; Affordability Period; Priority Housing Needs; and Non-Federal Funding Sources.

The following selection criteria, all given equal consideration, will be used to evaluate HTF applications.

HTF Criteria	Points Possible
1. Geographic Diversity	10
2. Ability to Obligate Funds	10
3. Timeliness	10
4. Project Based Rental Assistance ELI	10
5. Affordability Period	10
6. Priority Housing Needs	10
7. Non-Federal Funding Sources	10
Total Possible Points	70

Specific questions regarding the application criteria will be made available within the HTF Cycle Application Guidelines.

Overall, the information provided above is a summary of the criteria that will be utilized within the HTF Cycle.

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for the HTF program.

1. Nebraska will reserve a portion of the State’s annual HTF allocation for affordable multi-family rental projects, single-family rental projects and rental rehabilitation projects in coordination with the Nebraska Investment Finance Authority’s (NIFA) joint DED/NIFA application for low income housing tax credit applications within the Low Income Housing Tax Credit (LIHTC) 9% application cycles. This allocation will be referred as the “LIHTC 9% Set Aside”.

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

2. Nebraska will allocate a portion of the State’s annual HTF allocation for targeted needs housing projects funded with non-LIHTC resources. These projects will help determine how the State can develop smaller scale projects multi-family rental projects, single-family rental projects and rental rehabilitation projects within areas of the state that are experiencing shortages of available housing for those populations with targeted needs. This allocation will be referred as the “Targeted Needs Set Aside”.

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

3. Nebraska will allocate the remainder of HTF funds for permanent housing projects for the homeless; persons at risk of homelessness, and other special needs populations. These funds will be made available for multi-family rental projects, single-family rental projects and rental rehabilitation projects within the Omaha CoC, Lincoln CoC, and the BoS Coc. This allocation will be referred to as the “Permanent Housing Set Aside.”

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

Describe threshold factors and grant size limits.

Eligible applicants include: local or regional non-profit 501(c)(3) or 501 (c)(4) housing or related service organizations; local units of government; and public housing authorities. In addition, to be eligible for HTF assistance, an applicant must meet the threshold items below:

When an application is received, it shall first be reviewed for eligibility to be scored and ranked. In order to be eligible for scoring and ranking, the application must be complete, must demonstrate that the proposed project at minimum meets the seven housing selection criteria, and includes the following information, unless waived by DED for good cause. Applications missing any of the following threshold items after the application submittal will be deemed incomplete and the applicant will be notified. In the Targeted Needs set-aside and the Permanent Housing set-aside, reasonable time will be given to the applicant to submit the missing information.

1. Submit a complete application to the State. After applications are submitted, the State will conduct a completeness review. The application will be deemed complete if the application package contains, at a minimum the following:
 - a. Required application forms submitted: all required DED-provided forms for current year application will be posted on the DED website prior to the beginning of the application cycle.
 - b. Required third-party documents submitted. A checklist and instructions of the complete list of required documents will be posted prior to application cycle.
 - c. Applicants must comply in all respects with DED Rehabilitation Standards as to content and adhere to any necessary HUD environmental regulatory requirements.

Subsequent to the completeness review applicants will be contacted via email regarding any missing and/or incomplete items or documents. Applicants must submit all missing and/or incomplete items or documents in order to be considered for funding.

2. Provide description, reference and/or supporting documentation that an eligible activity is proposed by the project according to the Nebraska HTF Allocation Plan eligible activity definition, which is that activities may include rehabilitation (including acquisition); preservation; new construction; and operating assistance. These activities will benefit extremely low-income (ELI) households, at or below 30% of the Area Median Income (AMI).
3. Demonstrate the financial feasibility of the project.
4. Certify that housing assisted with HTF funds will comply with HTF requirement.
5. Demonstrate that the State requirement and HTF Regulations concerning a sustained 30-year affordability period is maintainable.

HTF funding will be dependent on the type of program in which the applicant applies. Refer to Appendix, Section 1.2 and Section 5.1 for the distribution of the allocation for the HTF program. There is no maximum grant limit within the set amount per set-aside.

Other threshold factors include:

Maximum Per-unit Development Subsidy Amount

The State will adopt limits used in other federal programs and will utilize the current HOME maximum per unit subsidy limits. These existing limits are developed for another program; are being adopted for the HTF program; and will meet the HTF requirements.

The HTF Maximum Per Unit Subsidy will be consistent with the current HOME Maximum Per Unit Subsidy Limits for Nebraska. The current limits include a calculation based on the Section 234 Basic (Elevator type) Limit up to 240%. This maximum subsidy is consistent with HUD guidance including information within CPD Notice 15-03 and HOME Fires Vol. 12 No 1. The HOME Maximum Per Unit Subsidy Limits for Nebraska can be found at: <http://opportunity.nebraska.gov/data>.

What are the outcome measures expected as a result of the method of distribution?

It is anticipated that housing units for ELI persons will be created and retained throughout the state and additional permanent supportive housing and special needs housing will be made available.

STATE PROGRAM NAME: HOPWA Program

Funding Sources:

HOPWA funds

Describe the state program addressed by the Method of Distribution.

Within the HOPWA Services Priority Need, HOPWA funds will be utilized to provide supportive services to persons, and their families, with HIV/AIDS that include: case management services with medical and self-sufficiency components; outreach to HIV+ homeless persons/families and homeless service providers; emergency rental/mortgage assistance; utility assistance; tenant-based rental assistance (TBRA); permanent housing placement (including first/last month's rent, security deposits, rental application fees); housing information services and resource identification; and for the maintenance of case management software system, purchased in June 2020. The case management software system will be utilized by both HOPWA and Ryan White Part B Program staff and the project sponsor.

The HOPWA Program prioritizes outreach to the chronically homeless and homeless persons, and their families, living with HIV/AIDS in order to help address their housing, supportive services, and medical needs.

DHHS provides HOPWA resources to the Nebraska AIDS Project (NAP), the HOPWA Project Sponsor, in order to carry out activities throughout the state. The strategy of the program is to support and facilitate NAP's participation and involvement in the seven regional Continuum of Care (CoC) Committees. DHHS participates on the Statewide Continuum of Care Committee. It is the goal of HOPWA staff to coordinate with ESG Program staff, and homeless service providers, in order to coordinate homeless activities. These collaborations will help to ensure that the special needs of persons living with HIV/AIDS in Nebraska will be represented at both the regional and the state level planning processes.

The HOPWA Program also participates in the Nebraska HIV Care and Prevention Consortium (NHPC) which consists of HIV/AIDS medical providers, service providers, consumers, and other members of the public. Several of the members of the NHPC are representatives of the Nebraska Red Ribbon Community. The Nebraska Red Ribbon Community is a diverse group of individuals located in various geographic regions across Nebraska. This diverse group of persons living with HIV/AIDS collaborate with DHHS to enhance and enrich the lives of fellow HIV positive persons. In addition, the HOPWA Program Manager works closely with the Ryan White Part B Program Manager, the AIDS Drugs Assistance Program Manager and the Ryan White All Parts Committee members to coordinate services for persons living with HIV/AIDS. Committee meetings are held on a quarterly basis. The HOPWA Program works with the Nebraska Housing Developers Association (NHDA) to continue RentWise training to HOPWA clients across the state.

If the needs exceed the funding available, a waiting list may be developed to ensure all eligible individuals may be served in the future when funds are available.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Nebraska AIDS Project (NAP) is the only AIDS Service Organization in Nebraska that provides case management services statewide to persons living with HIV disease. Because of this, DHHS awards HOPWA funds to NAP directly through a sole source contract deviation process. Requirements of the contract with Nebraska AIDS Project include their ability to provide case management and supportive services to eligible

HOPWA clients. Other requirements include the assurance of confidentiality, to ensure that all persons who qualify for assistance know of the program, assurance of ongoing programmatic and financial monitoring and maintain reporting requirements. It is required for the project sponsor to be compliant with federal and state regulations.

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

Within Nebraska, the Nebraska AIDS Project (NAP) is the only AIDS Service Organization that provides case management services statewide to persons living with the HIV/AIDS disease. Because of this, DHHS awards HOPWA funds to NAP directly through a sole source contract deviation process. NAP serves as the project sponsor for the HOPWA Program and has offices located in Omaha, Lincoln, Kearney, Norfolk, and Scottsbluff.

Describe how resources will be allocated among funding categories.

Refer to Appendix, Section 1.2 – Estimated Categorical Distribution Table for the anticipated funding for the HOPWA program. The majority of those resources will be awarded to the Nebraska AIDS Project, in order to administer the HOPWA Program. DHHS will adjust the estimated proposed allocation of HOPWA to match the actual allocation amounts from HUD. The budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

HOPWA funds will be used to support the goal of reducing homelessness and increasing housing stability for special needs populations through the following activities below. Programs identified with AID are those operated and managed by the Nebraska AIDS Project (NAP).

DHHS HOPWA FY2020

Formula (State) Administrative: \$18,252

*Housing Information Services: \$17,704

Total: \$35,956

NAP HOPWA FY2020

Formula Administrative AID: \$40,071

Supportive Services AID: \$113,122

Permanent Housing Placement AID: \$24,000

Resource Identification AID: \$11,908

Short-term Rent/Mortgage AID: \$176,516

Long-term Rent AID: \$206,828

Total: \$572,374

*\$17,704 is being reserved to maintain the case management software. This figure may be reduced due to prorated between the HOPWA program and the Ryan White Program.

Describe threshold factors and grant size limits.

Services provided by Nebraska's HOPWA program are limited to services that can be delivered under the funding allocation the program receives and provides to Nebraska AIDS Project. There are no State dollars provided to the HOPWA program. Other threshold factors will be defined by DHHS in collaboration with NAP through the implementation of HOPWA services.

What are the outcome measures expected as a result of the method of distribution?

Through HOPWA resources needed services will be provided to persons living with HIV/AIDS and their families throughout the state, including emergency rent and mortgage assistance, permanent housing placement, and tenant-based rental assistance.

STATE PROGRAM NAME: Nebraska Homeless Assistance Program (NHAP)

Funding Sources:

ESG funds and HSATF resources

Describe the state program addressed by the Method of Distribution.

The allocation priorities, statewide funding, and Homeless Services Priority Needs influence the methods of distribution for NHAP funding. ESG funds will be utilized, along with Homeless Shelter Assistance Trust Fund (HSATF) resources, in order to provide funding for activities that provide a comprehensive approach to address the needs of people who are homeless or at risk of homelessness in Nebraska. These activities are intended to: assist in the prevention and alleviation of homelessness; provide temporary and/or permanent housing for persons who are homeless; and to encourage the development of projects that link housing assistance programs with efforts to promote self-sufficiency.

The statewide Continuum of Care (CoC) system has been developed to help ensure that people who are homeless or at risk of homelessness are able to access needed emergency shelter, street outreach, homelessness prevention, and rapid rehousing services in each of the 93 counties in Nebraska. NHAP is the recipient of the ESG funds for the Balance of State CoC which are allocated to the five rural CoCs and also is the recipient of state Homeless Shelter Assistance Trust Funds (HSATF) which are allocated to all seven regions. NHAP subcontracts with the City of Lincoln to allocate funds in combination with the City of Lincoln's ESG funding. Eligible applicants apply for combined ESG and HSATF funding through a joint application developed by NHAP. The City of Omaha eligible applicants apply for HSATF funding through the regular NHAP application process and apply separately to the City of Omaha for ESG funds allocated to the region. HSATF funds in the City of Lincoln and Omaha will also be used for street outreach activities.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

NHAP adopted a two-year funding cycle in 2003. The first year involves a competitive application process that is open to any eligible applicant. The second year will be a renewal application process that is open only to existing NHAP recipients in good standing. For FY 2020, NHAP is in the 1st year of the 2 year funding cycle, thus the funding application is open to any eligible applicant. See <http://dhhs.ne.gov/Pages/Homeless-Assistance.aspx> for further information on the 2 year funding cycle. Applicants are scored based on their capacity to meet the needs of homeless and at-risk of homeless persons within their continuum and aligns with the statewide plan to end homelessness. NHAP funding is limited thus making the application process extremely competitive.

NHAP applicants submit an extensive application which includes information on the applicant's experience, fiscal stability, performance measures, and strategies for meeting federal program requirements, meeting the needs of the targeted populations in their community, supporting self-sufficiency of program participants, coordinating with mainstream services, collaboration with other homeless providers, participation in Coordinated Entry, adherence to the Housing First model, and projected outcomes for program participants. Performance measures include percentage of exits to positive housing destinations, percentage of increases in cash and non-cash benefits, and percentage of returns to homelessness.

Teams of independent reviewers score the applicants and funding is allocated based on the applicant’s overall score, the identified need for services within the region and alignment with the statewide plan to end homelessness.

In addition, NHAP subrecipients are monitored for program compliance and fiscal management. NHAP conducts these monitors through quarterly fiscal reviews and on-site monitoring visits. Feedback from the monitors is shared with the subrecipients and any corrective actions are noted. NHAP also collaborates with the monitoring agencies for the entitlement cities in Nebraska (Omaha & Lincoln) to share monitoring results to improve program outcomes for agencies where NHAP and HUD funding overlap. Monitoring results are shared with the review teams for final funding determination.

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

The State NHAP (ESG/HSATF) program is awarded through a competitive application process. Announcements of funding opportunities are posted on the DHHS website and the Requests for Applications are distributed to each regional CoC email list. Funding by geographic region is announced prior to the application process. Funding awards are based on input from the applicable CoC to ensure an inclusive array of services in the region and review of the applications received to meet service needs in each geographical region. The eligible applicants are units of general local government and individual non-profits, including faith-based organizations.

Describe how resources will be allocated among funding categories.

ESG funds will be allocated among the HUD ESG eligible activities including Emergency Shelter, Homelessness Prevention, Rapid Rehousing and HMIS. The estimated allocations are determined by program activity needs as presented in the NHAP application and evaluation of data within the CoC regions. It is ensured that no more than 60 percent of the total ESG award is allocated to Street Outreach (SO) and Emergency Shelter (ES) services.

Service	Estimated ESG Funds Only
Street Outreach (SO)	\$0
Emergency Shelter (ES)	\$452,132
Maximum SO & ES Subtotal (no more than 60% of Total Award)	\$452,132 (45% of total award)
Homelessness Prevention	\$345,050
Rapid Re-housing	\$78,675
HMIS	\$58,300
Services Subtotal	\$934,157
Estimated Administration (7.5%)	\$75,742
Total ESG Award	\$1,009,899

***Background Information:**

NHAP is a program that combines both federal funds (ESG – Balance of State (BoS)) and State funding (HSATF). The State of Nebraska is the recipient of the ESG BoS funds which are proportionally allocated per the HUD Preliminary Pro Rata Need formula to all 5 regions that comprise the BoS. The BoS ESG funds are combined with the HSATF funds for allocation for the BoS. Each of the 5 regional CoCs conducts discussions of needed services in their continuum after NHAP’s available funding is

announced to ensure that a full array of services are available within the regional continuums and expected outcomes are being achieved.

NHAP also allocates the HSATF funds to the entitlement CoC cities of Omaha and Lincoln. Currently, the Lincoln CoC ESG recipient is a subrecipient of NHAP. The Lincoln CoC utilizes the HSATF funds as matching dollars for the ESG funds which are conjoined and distributed through competitive application process. Currently, the outcome data is reported through the City of Lincoln CAPER report. The Lincoln CoC ESG recipient will award ESG and HSATF funding directly through the competitive application process in coordination with NHAP to ensure the array of CoC identified needed services are provided within the region and identified outcomes of the CoC are achieved.

Conversely, NHAP does not provide the HSATF matching funds for the City of Omaha ESG recipient thus NHAP subrecipients submit applications for NHAP's HSATF funding through the regular NHAP competitive application cycle. NHAP funded subrecipients from Douglas and Sarpy counties report their data outcomes directly to NHAP's CAPER submission as part of the State matching funds made available to support the ESG funded program.

The Omaha ESG recipient allocates and distributes ESG funding through a separate application process thus this data will be reported by the Omaha CoC ESG recipient in their CAPER report for the region. The Omaha CoC ESG recipient utilizes other sources of funds to meet ESG matching requirements.

***NOTE:** The Nebraska Homeless Assistance Program reserves \$75,000 annually of the Homeless Shelter Assistance Trust Funds to be distributed in the event of a natural disaster to assist individuals and families that are homeless and at risk of homeless due to the effects of the natural disaster within the State of Nebraska. Current NHAP funded agencies within any of the Nebraska Continuum of Care Regions that provide service coverage within areas for federally designated disaster zones may apply for the natural disaster relief funds. All activities requested to be funded must comply with the ESG program requirements identified in the Code of Federal Regulations Title 24 Part 576. In instances where natural disaster relief funds are not necessitated within the program year, the legislatively established set-aside funds of \$75,000 are allocated for the subsequent fiscal year to maintain the natural disaster relief fund.

Describe threshold factors and grant size limits.

NHAP funding is based on the PPRN formula with a hold-harmless base. The formula helps ensure an equitable distribution of funds throughout the entire state. The formula is calculated using a \$50,000 base 'hold harmless' funding amount per geographic Region; the Department of Housing and Urban Development's (HUD) annual Continuum of Care pro rata amounts; and consideration of statewide service continuity. The initial allocation formula was developed with input from the NHAP advisory committee. Due to annual fluctuations in the pro rata need amounts and the need to help ensure statewide continuity of necessary services, should applying the formula result in a decrease in funding from the prior year for the majority of the regions, or a significant increase in one or more regions, adjustments could be made to reduce the impact of the change in available funding by region.

At present, DHHS does not have grant limits established for NHAP funds per subrecipient agency. However; because DHHS attempts to achieve equitable distribution of grant awards which are determined by available funds, identified service gaps and the number of requests, the NHAP review teams determine final funding based on the community needs and applicant application score.

What are the outcome measures expected as a result of the method of distribution?

NHAP's primary focus is to end all forms of homelessness. For 2020, individuals will be served through Homelessness Prevention, Rapid Rehousing, and Emergency Shelter programs to ensure that homelessness is rare, brief and non-reoccurring for individuals and families.

Discussion: Community Development Block Grant (CDBG) Redistribution and Reallocation of Funds

Funds remaining uncommitted and unobligated from prior years' allocations on the acceptance date for the 2020 CDBG Program, from any funding category, will remain in their funding category. If the remaining uncommitted and unobligated funds exceed the total amount of eligible and viable applications in the original funding category, or if funds need to be moved to another category in order for DED to meet timely distribution requirements, the funds may be distributed among any CDBG funding category identified in the 2020 Annual Action Plan. Funds for State Administration and Technical Assistance that are not used in a Program Year may be carried forward to the next Program Year.

Reallocated Funds

Funds reallocated by HUD during 2020 shall be used in conformance with the 2020 CDBG Application Guidelines, unless otherwise specified by HUD.

Redistributed Funds

A categorical adjustment allows DED to reserve up to 15% of the total CDBG allocation for use as needed among categories. An adjustment of more than 15% of the total allocation, or the creation or elimination of a category, will be considered a substantial amendment to the AAP, and would require further steps as identified within the Citizen Participation Plan section of the Consolidated Plan. Adjustments may be made for remaining balances within a Category within the last three months following a 12-month Program Year in order to meet the HUD Timely Distribution requirement that requires the CDBG grant amount for a given Federal Fiscal Year to be distributed within a HUD required 15-month time-frame.

Recaptured Funds

Funds periodically recaptured by DED from grantees including, but not limited to, those that are recaptured due to: (a) unexpended CDBG funds for approved activities and (b) disallowed expenditures of CDBG funds for unapproved or ineligible activities, will be redistributed according to the following priorities.

The first priority for the redistribution of recaptured CDBG funds is to the Public Works (PW) Category. The amount redistributed will not exceed the total funds required to fund all eligible and viable projects in the PW Category application cycle.

The second priority for the redistribution of recaptured CDBG funds is to the Downtown Revitalization (DTR) Category of the Community Development Priority Need. The amount redistributed will not exceed the total funds required to fund all eligible and viable projects in the DTR Category application cycle.

Funds recaptured from Economic Development category grantees may be redistributed to either the Economic Development category or the Tourism Development category in conformance with 2020 Application Guidelines, or may be distributed among other funding categories.

Funds cancelled and recaptured from CDBG grantees will be redistributed in conformance with the CDBG Application Guidelines as follows: (1) if there are sufficient funds within 105 days from the date of the 2020 grant awards, the next ranked fundable applicant(s) may be awarded; or (2) if funds are insufficient, these funds, and any other funds recaptured after the 105 day period and prior to the 2020 CDBG application acceptance date, may be redistributed in conformance with the 2020 CDBG Application Guidelines.

AP-35 Projects – (Optional)

Introduction:

ESG and HOPWA, have been added to the AP-35 Section as projects. Both DHHS programs have been added per current IDIS guidance material available through HUD. The CDBG, HOME, and HTF Programs of DED will not be added this program year but the Department will continue to move forward in making technical updates to be able to load those programs in the AP-35 also in the future.

ESG projects have been determined through the NHAP application process and included in the AP-35.

The 2020 Program Year begins July 1, 2020. Funding for CDBG, HOME, and HTF projects will not be determined until program-specific applications are received and evaluated, which will occur in 2020.

It is for this reason that the table below is blank for some programs as generated by the IDIS system.

IDIS Project ID	Project Title
1	ESG20 Nebraska
2	2020 Nebraska AIDS Project NEH20-F999 (NAP)
3	2020 State of Nebraska NEH20-F999 (NE)

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The 2020 Program Year allocation priorities were determined through the 2020-2024 Consolidated Planning process. The 2020 Program Year allocation priorities were determined through the 2020-2024 Consolidated Planning process. The largest obstacle to meeting underserved needs include a lack of funding opportunities to meet all need. The State makes every attempt to coordinate efforts to provide services and facilities throughout the State.

CDBG-DR

The Nebraska CDBG-DR Action Plan priorities can be found in the CDBG-DR Action Plan, <https://opportunity.nebraska.gov/cdbg-dr/>

AP-38 Project Summary (optional)

Project Summary Information

1	Project Name	ESG20 Nebraska
	Target Area	Statewide
	Goals Supported	Reduce Homelessness
	Needs Addressed	Homeless Services Priority Need
	Funding	Homeless Shelter Assistance Trust Fund: \$1,150,000 ESG: 1,009,899
	Description	The Nebraska BoS plans to utilize the 2020 federal Fiscal Year allocation of ESG funds to operate shelters throughout the state; provide utility, other financial assistance and services to prevent homelessness; provide rent, other financial assistance, and services to support rapid rehousing programs; strategize with the Coordinated Entry system to quickly house homeless individuals; collect data on homelessness through HMIS, and for program administration.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted Homeless Person Overnight Shelter: 1950 Persons Assisted Homelessness Prevention: 945 Persons Assisted
	Location Description	The ESG and HSATF funds that comprise NHAP funding are distributed throughout Nebraska Balance of State.
	Planned Activities	Provision of homeless and at risk of homeless services through Emergency Shelter, Rapid Rehousing and Homelessness Prevention services. Provide funding support for the HMIS systems in the State of Nebraska for contributing data for outcome and compliance reporting for ESG and HSATF activities.
2	Project Name	2020 Nebraska AIDS Project NEH20-F999 (NAP)
	Target Area	Statewide
	Goals Supported	Assist Persons with HIV/AIDS
	Needs Addressed	Persons with HIV/AIDS
	Funding	HOPWA: \$572,445
	Description	The Project Sponsor will provide administrative oversight, direct information services, tenant-based (long-term) rental assistance, short-term rent, mortgage and utility assistance, supportive services and permanent housing placement.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Tenant-based rental assistance / Rapid Rehousing: 15 Households assisted annually; public service activities other than LMI Housing benefit to 15 persons assisted, and Homeless prevention to 60 persons assisted.
Location Description	Statewide	

	Planned Activities	Provision of decent, safe and affordable housing and supportive services to people who are homeless and/or at imminent risk of becoming homeless for households who have at least one person infected with the HIV virus through direct information services, tenant-based (long-term) rental assistance, short-term rent, mortgage and utility assistance, supportive services and permanent housing placement.
3	Project Name	2020 State of Nebraska NEH20-F999 (NE)
	Target Area	Statewide
	Goals Supported	Assist Persons with HIV/AIDS
	Needs Addressed	HOPWA Priority Need
	Funding	HOPWA: \$35,956
	Description	The State of Nebraska will provide grantee administrative oversight as the project sponsor administers direct information services, tenant-based (long-term) rental assistance, short-term rent, mortgage and utility assistance, supportive services and resource development.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The State of Nebraska will provide grantee administrative oversight as the project sponsor administers tenant-based rental assistance to an estimated 15 households annually, public service activities other than LMI Housing benefit to 15 persons, and Homeless prevention to 60 persons.
	Location Description	Statewide
	Planned Activities	The State of Nebraska will provide grantee administrative oversight of project sponsor-led activities to provide decent, safe and affordable housing and supportive services to people who are homeless and/or at imminent risk of becoming homeless for households who have at least one person infected with the HIV virus through direct information services, tenant-based (long-term) rental assistance, short-term rent, mortgage and utility assistance, supportive services and permanent housing placement.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds? No

Available Grant Amounts

Not applicable.

Acceptance process of applications

Not applicable.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State’s Process and Criteria for approving local government revitalization strategies

Annually, the State reviews the local revitalization strategies within the CDBG categories of Owner Occupied Rehabilitation, Planning, and Downtown Revitalization. This strategy review includes evaluating the planning process completed during the pre-development phase of the project, and evaluating the proposed activities within the planning goals and objectives that build on the revitalization strategies for the Community Development and Housing priorities. This is to ensure that during the 2020 Program Year, these activities meet a CDBG national objective of either benefitting low-and-moderate income persons (through the subcategories LMI Area Benefit; LMI Limited Clientele; or LMI Housing) or the Elimination of Slum and Blight (through the subcategories of area or spot basis).

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

The State of Nebraska has chosen not to target any particular geographic area for special assistance, but has chosen to allow any non-entitlement community to apply for CDBG funding, dependent on eligible activities and programs, and provides HOME, HTF, ESG, and HOPWA funding throughout the state.

Geographic Distribution

Target Area	Percentage of Funds
Statewide	100

Table 2 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The State of Nebraska has chosen not to target any particular geographic area for special assistance, but has chosen to allow any non-entitlement community to apply for CDBG funding, dependent on eligible activities and programs, and provides HOME, HTF, ESG, and HOPWA funding throughout the state.

Discussion

The State of Nebraska will distribute development resources in proportion to the development needs of the state. In general, DED and DHHS will approve funding for development projects that satisfy specific criteria and fund projects throughout the state. There is no specific target area for funding distribution, but program assistance is provided statewide.

Nebraska is served by a system of service providers throughout the state. The majority of these service providers are located in the areas where need has been shown according to the Census data available and other economic indicators. Some of these indicators include the community population, where those communities with the largest populations tend to have the greatest number of service providers within any given geographic area.

LIHTC 9% Set Aside

For HTF applicants applying within the LIHTC 9% Set Aside, the entire state is the eligible area. The joint DED/NIFA application cycles for LIHTC 9% achieves geographic diversity by awarding 50% of available funds to projects in urban areas and 50% to projects located in rural areas. In addition, the scoring methodology assigns 3 points for a project located in a community population of less than 5,000, 2 points for a project located in a community population of 5,000 to 15,000, and 0 points for a project located in a community population of more than 15,000.

Targeted Needs Set Aside

For HTF applicants applying within the Targeted Needs Set Aside, the entire state is the eligible area. While two of the three Set Asides do provide geographic diversity, the Targeted Needs Set Aside will not have a scoring hierarchy associated with geography. This is due to funding limitations and feasibility.

Permanent Housing Set Aside

For HTF applicants applying for the Permanent Housing Set Aside, funds will be distributed equally between the Continuum of Care (CoC) Regions of the Nebraska Homeless Assistance Program (NHAP), which are the Omaha CoC, the Lincoln CoC, and the Balance of State (BoS) CoC. The Omaha CoC and the Lincoln CoC are regions located in the Southeast area of Nebraska, are approximately 60 miles apart, and are both urban communities. The BoS CoC consists of the remaining geographical areas of the state, where many rural communities exist, and which was formerly five separate NHAP regions, named after the remaining state geographical areas: the Panhandle, North Central, Southwest, the rest of the Southeast, and Northeast CoC Regions of Nebraska.

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

Below is a summary of the one year goals for a number of categories that relate to affordable housing. These one year goals are related to the federal resources provided through CDBG, HOME, HTF, ESG, and HOPWA and also include HSATF and NAHTF projects.

One Year Goals for the Number of Households to be Supported	
Homeless	150
Non-Homeless	324
Special-Needs	15
Total	489

Table 3 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	165
The Production of New Units	180
Rehab of Existing Units	144
Acquisition of Existing Units	25
Total	514

Table 4 - One Year Goals for Affordable Housing by Support Type

Discussion:

As the information above demonstrates, a significant number of households are served annually through affordable housing programs. See below for further information

Homeless

One year goals for the number of “Homeless” households supported are estimated from the number of households that will receive through the Nebraska Homeless Assistance Program (See also AP-20).

Non-Homeless

One year goals for the number of “Non-Homeless” (also identified as individuals or families who are at risk of homelessness) are estimated from the number of households served under the NHAP-Homelessness Prevention component for rental assistance. (See also AP-20).

Special-Needs

One year goals for the number of “Special-Needs” are estimated from the number of households that will be served through the HOPWA and HTF Programs (See also AP-20).

Rental Assistance

Rental assistance will be completed primarily through ESG and HOPWA resources that include: Tenant Based Rental Assistance (TBRA); financial assistance including rental application fees, security and utility deposits, last month's rent, utility payments, and moving costs; and short-term rent assistance. In addition, HSATF resources will also be used for this activity. The total estimated number of households for "Rental Assistance" includes ESG and HOPWA estimates of TBRA assistance combined (See also AP-20).

Production of New Units

The production of new units will be completed primarily through HOME and HTF resources that will be utilized through the NIFA/DED Low Income Housing Tax Credit (LIHTC) Application Cycle that utilizes LIHTCs and HOME/HTF funds in order to provide additional affordable housing. In addition, NAHTF resources may also be used for this activity.

HOME funding is available to eligible CHDO organizations to be utilized for CHDO eligible activities, which includes the construction of new housing units.

Rehabilitation of Existing Units

Rehabilitation of existing units is completed primarily through CDBG resources within the Owner Occupied Rehabilitation Category. Additional rehabilitation activities may occur through the NIFA/DED Low Income Housing Tax Credit (LIHTC) Application Cycle that utilizes LIHTCs and HOME/HTF funds in order to provide additional affordable housing. HTF funds can also be used for rehabilitation through the Targeted Needs and Permanent Housing set-asides. In addition, NAHTF resources may also be used for this activity.

Acquisition of Existing Units

HOME funding is available to eligible CHDO organizations to be utilized for CHDO eligible activities, which includes the purchase, rehab and resale of existing housing units.

It is anticipated that additional households will be supported through NAHTF projects, which will likely include those that involve acquisition of existing units.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

Not applicable.

Actions planned during the next year to address the needs to public housing

Not applicable.

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

Not applicable.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion:

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

The activities that the State of Nebraska will undertake in 2020 are described in the following narratives.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The State of Nebraska's NHAP funding is focused on assisting the populations with the greatest needs in support of reaching the goal of functional zero of homeless individuals in Nebraska. The Coordinated Entry process utilizes assessment tools which prioritizes those with the highest needs in our communities. The particular population that ranks as the highest risk are those that are unsheltered and/or are chronically homeless as defined by HUD's Final Rule. NHAP will continue to fund Street Outreach and Emergency Shelter programs to provide a support system for those individuals that are literally homeless. Street Outreach funds will only be provided in Lincoln and Omaha entitlement communities utilizing the HSATF funding. All individuals who enter homeless programs in Nebraska are provided the opportunity to be referred to the Coordinated Entry system to access permanent housing.

Identifying these individuals has created a more efficient homeless service systems by targeting resources toward those who need them most and helping clients move to appropriate permanent housing programs in an expedited manner. This is a change from the "first come, first served" model to serving those with the greatest risks and needs. In Nebraska, the Coordinated Entry System in the Balance of State has been established to rank those individuals with the highest needs for Permanent Supportive Housing. Other homeless individuals who rank with less intensive needs may qualify for Rapid Rehousing Programs.

A major goal of the Coordinated Entry system is the establishment of a statewide Coordinated Entry list which provides homeless individuals and families to have additional client-choice to relocate to another part of the state in order to move closer to natural supports, employment opportunities or proximity to services.

NHAP will continue to require subrecipient participation in conducting the standardized assessment for every individual that is literally homeless or in emergency shelter and referring to the Coordinated Entry system if the program participant so chooses to do so. NHAP is in partnership with the HMIS provider to receive customized reports regarding entry and exits from homeless assistance programs to monitor NHAP subrecipient compliance with utilizing the Coordinated Entry process.

Additionally, the Coordinated Entry Manager and the public access doors will train other community agencies that encounter unsheltered homeless persons. This includes law enforcement, hospital emergency units, faith communities and other service agencies to continue building symbiotic relationships in efforts to increase the referral networks with CoC provider agencies when they encounter unsheltered persons in need of assistance.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Shelter and Transitional Housing are a critical part of the homeless service system and will remain a needed service throughout the State for a variety of reasons, but not limited to; restrictive participant income eligibility for Rapid Rehousing (RRH) and/or CoC funded programs, short-term housing solutions for working poor experiencing temporary barriers to independent housing due to financial shortfalls, individuals experiencing domestic violence, lack of immediately available fair market housing, individuals exiting substance abuse treatment centers, youth under the age of 25, and to meet special needs of subsets of program participants.

Shelters provide temporary refuge and often serve as the “front door” or first place of entry to those experiencing homelessness to receive supportive services and access mainstream services. NHAP recognizes the importance that emergency shelters have in connecting those experiencing homelessness with the resources needed to exit homelessness and move to self-sufficiency. Despite these barriers to permanent housing for some individuals, agencies have been making increased efforts to collaborate within their region to provide seamless services from emergency shelter to permanent housing solutions through the utilization of the Coordinated Entry system. The goal of the Coordinated Entry system in the upcoming year is to also include Transitional Housing into the Coordinated Entry system to serve individuals who may need longer term shelter stays and to serve those with priority needs, such as homeless youth, victims of domestic violence and individuals who are recovering from substance abuse.

For NHAP programs funded to support Emergency Shelter and Transitional Housing Programs, performance will be measured based on:

- Increased bed utilization rate.
- Decreased average length of stay of the households served in Emergency Shelter/Transitional Housing
- Increase in the percentage of discharged households to permanent housing.
- Minimal rates of returns to homelessness

To evaluate these performance measures, NHAP requests data from the HMIS system and has requested customized reports which evaluate the programs on percentage of exits to permanent housing and returns to homelessness. This data will be used to evaluate the effectiveness of programs for funding determination and to address any performance issues with current NHAP subrecipients

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

The State of Nebraska will continue to uphold the expectation that NHAP sub-recipients will coordinate services, utilize the “Housing First” model, and encourage prioritization of Rapid Re-Housing programs towards the end goal ending homelessness in Nebraska. Technical assistance will continue from the State to support the implementation of Outreach and Rapid Re-Housing services through NHAP grant awards towards the end goal of increasing the number of homeless households placed into sustainable permanent housing. NHAP is an active participant of the Coordinated Entry (CE) planning committee and

a member of the CE governing body to provide feedback and to ensure inclusion for all homeless and at risk of homeless in our communities.

All NHAP subgrantees have the expectation that they will participate in their local Continuums of Care to coordinate resources to ensure that homeless individuals are identified and provided the appropriate array of services to meet their needs to encourage sustainability. Utilizing the CoC's Coordinated Entry system allows for standardized assessment to promote placing homeless individuals into appropriate permanent housing and more effectively targets resources to those most in need. Nebraska is utilizing standardized assessment tools to target the most vulnerable and chronically homeless individuals, youth and families in the State. Higher scores correspond to greater need and are prioritized on the CoC Permanent Supportive Housing (PSH) CE list and those individuals with less intensive needs are placed into permanent housing through Rapid Rehousing programs. Homeless youth are identified for the Transition Aged Youth program that operates within the CE system. Consequently, by identifying chronically homeless and the most vulnerable individuals in the state, active coordination between agencies and then making an expedited and appropriate level of intervention, individuals and families are experiencing homelessness are served in an efficient manner.

NHAP has also directly worked with victim service providers, who are not required to utilize the HMIS system, to promote engagement with the Coordinated Entry system to ensure that the clients served by these types of programs have access to all permanent housing options in conjunction with supportive targeted services. NHAP and the Coordinated Entry manager will continue to train the victim service providers and the state-wide Domestic Violence/Sexual Assault Coalition on the Coordinated Entry processes with special consideration will be provided to protect the confidentiality of individuals utilizing victim services programs.

Nebraska also maintains a Veteran's Coordinated Entry process through the SSVF funding source. Veterans who present at a homeless service provider as homeless or at-risk of homeless are referred to this program for permanent housing opportunities and other supports. In the event of lack of capacity in SSVF, veterans are given priority scoring on the conventional Coordinated Entry list. A major accomplishment for the Nebraska BoS has been certification by the United States Interagency Council on Homelessness (USICH) as achieving functional zero for homeless veterans. The SSVF program is an active participant in the Continuums of Care and will continue to meet the needs of homeless veterans.

Over the course of the next year, NHAP will continue to monitor the length of time households are homeless through HMIS and then establish targets for agencies to assist households into permanent housing utilizing the "Housing First" model. NHAP will monitor subrecipients continued progress on increasing the number of households being placed in permanent housing and provide technical assistance, resources and supports to agencies to promote ending homelessness in Nebraska. NHAP will continue to coordinate with DED and other Federal and State agencies to identify where there is a lack of affordable housing and gaps in services across the State.

It is the goal of NHAP to efficiently and successfully provide permanent housing to the homeless and make all efforts to prevent returns to homelessness. To measure the success of each NHAP funded agency, NHAP is tracking the number of returns to homelessness for individuals/families who have exited to permanent housing in order to provide technical assistance and for funding determinations to promote successful outcomes.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and

systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Throughout Nebraska, many communities have systems in place funded through NHAP which are targeted towards homelessness prevention. A heavily weighted scoring component was included in the NHAP application to promote collaboration between homeless assistance and mainstream service providers to maximize the funding availability to avoid individuals and families from becoming homeless. These efforts to connect homeless and at risk of homeless to mainstream economic assistance services are evaluated through the NHAP application process.

NHAP funded agencies are required to have a formalized process for referring eligible low-income individuals and families to access self-sufficiency resources. Public benefits such as food stamps (SNAP), TANF, and other benefits offered through DHHS and other community agencies are just a few examples of services distributed state-wide to provide financial assistance to those who are extremely low-income and require assistance in order to stabilize financial situations to promote housing stability.

In addition, a diversion training was provided to all homeless assistance providers throughout Nebraska to promote a model to divert low-income and at-risk of homeless individuals and families from entering homeless systems across the state. The diversion training also included a day for a train-the-trainer program which will allow for the participants to promote this model in local communities. Trainers will conduct sessions on the diversion process, both within their agencies and to community groups. Brochures and other materials will be developed for distribution to agencies and other entities that have contact with homeless and at risk of homeless individuals and families.

In further support of these efforts, NHAP currently sets aside a portion of the HSATF to provide financial support for agencies, designed by their local CoC, to assist individuals who are at risk of homeless or homeless with applying for Social Security Income or Social Security Disability Income benefits through the SSI/SSDI Outreach, Access and Recovery (SOAR) program to improve economic self-sufficiency for eligible candidates. The goal of NHAP is to expand this model with qualifying minor children and transition aged youth, particularly those aging out of foster care and juvenile correctional facilities.

NHAP also provides funding to Legal Aid of Nebraska to assist homeless and at-risk of homelessness individuals with addressing any legal issues that present as barriers to accessing housing. Services include landlord mediation, tenant rights protections, protection/harassment orders, divorce, paternity and custody matters, assistance with accessing public benefits such as child care, SSDI, SSI, and other cash benefits, and resolving consumer debt issues. These funds are also NHAP set-aside funds and not reported in the total HSATF funding available in the AAP.

NHAP will continue to evaluate policies across the CoC regions in order to help low-income individuals and families to avoid becoming homeless, especially extremely low-income families who are being discharged for the publicly funded institutions and systems of care, such as health care facilities, mental health facilities and other youth facilities, and correction programs and institutions. There is a high expectation that the CoC regions and NHAP subrecipients actively promote and pursue coordination with community providers to connect individuals served with mainstream resources and services.

AP-70 HOPWA Goals – 91.320(k)(4)

The primary goal of the HOPWA Program is to provide decent, safe and affordable housing and supportive services to people who are homeless and/or at imminent risk of becoming homeless. If funding permits, increasing access to employment opportunities/job training is a goal for the program, as well as increasing the number of individuals receiving tenant-based rental assistance. Eligibility for HOPWA funded services requires at least one person in the household be infected with the HIV virus and a household income at or below 80% of the area median income. Households with incomes above 80% of the area median income are eligible to receive HOPWA funded housing counseling and referral services. The priority population for HOPWA is serving the homeless and chronically homeless.

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	40
Tenant-based rental assistance	12
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	52

AP-75 Barriers to Affordable Housing – 91.320(i)

Introduction:

Below is information on the actions planned for 2020 and some background information on the State's efforts toward reducing barriers to affordable housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Annual Action Plan regulations require the State to describe the State's actions it plans to take during the next year to remove or ameliorate negative effects of its policies that serve as barriers to affordable housing as identified within MA-40 of the 2020-2024 Consolidated Plan. Many of these barriers are outside the control of DED, and are due primarily to economic forces, such as the cost of land and labor. However, the State continues to strive to remove barriers when at all possible. During the 2020 Annual Action Plan year, the following actions are planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing as it relates to utilizing CDBG, HOME, HTF, ESG, HOPWA, HSATF, and NAHTF resources, and these actions include:

Actions Related to Tax Policy affecting land and other property

The State will continue to evaluate steps to alleviate the property tax burden that is a barrier to affordable housing. The State has previously reviewed the tax structure as it relates to school districts, but will also review other areas of the tax policy that may be revised which reduce property taxes for Nebraskans.

In addition, the State will continue to review the tax policies affecting affordable housing and evaluate the impacts of the legislation under LB356, which revised the method for appraisals made on low income housing tax credit projects that was passed in 2015. The State will review whether the income-approach calculation will reduce the overall taxes on these properties that utilize low income housing tax credits (LIHTCs) and often times also use HOME or HTF or NAHTF resources.

Actions Related to Land Use Controls and Zoning Ordinances

The State, because it has very limited influence on land use controls and zoning ordinances, will continue to work with local governments to utilize good practices in ensuring the local land use controls and zoning ordinances do not negatively impact affordable housing development, thus removing an additional barrier to affordable housing. One way in which the State will accomplish this is to continue its collaboration with the Nebraska Chapter of the American Planning Association through its participation at the Nebraska Planning and Zoning Association (NPZA) Conference and other planning and zoning related events. Continued collaboration and educational outreach will assist in these efforts.

Actions related to Building Codes

The State will continue to work with local governments in ensuring that any building codes enacted at the local level do not have a negative impact on affordable housing. Efforts are needed to ensure that local building codes do not hamper additional investment for affordable housing throughout the state. The State will accomplish this through collaborating with community and county officials in educating them on the use of solid building code policy that will focus on ensuring safe and decent housing for individuals, including low-income persons, but at the same time implementing policies such as energy efficiency, into the codes.

In addition, the DED will continue to collaborate with the Nebraska Department of Environment and Energy in ensuring that affordable housing projects meet the property code standards within their developments.

Actions related to Growth Limits

The State, because it has very limited influence on communities utilizing regulatory barriers which place limits on the number of market rate, rental, and affordable housing that may be located within a given area, will continue to work with local governments in education and utilization of good practices in reducing the negative impacts of growth limits within communities. Education and outreach can be important tools in showing that mixed income developments (both market rate and rent-restricted units) are not harmful to communities, but can create benefits through the income diversity within a community. The State will continue its outreach, which assists in reducing any negative impacts that growth limits may have on affordable housing.

Actions related to Policies Impact Return on Residential Investment

Because the State does not have control of the amount of residential return on investment, as this is determined at the local level when a property is sold or when it is rented, the State has limited actions it can take to create more favorable policies that may impact return on residential investment. The State hopes that through education and outreach with affordable housing providers that a reasonable return on investment can be obtained within the development of affordable housing projects, which will help in reducing the negative impacts a limited return on investment may have on housing development. The State will continue to work with local governments, housing providers, housing developers, and other affordable housing entities in order to help assist in the creation of favorable policies that improve return on residential investment and that will reduce the negative impacts on policies related to this issue.

Actions Related to Other Effects of Public Policy on Affordable Housing and Residential Investment

The State will continue to evaluate additional barriers or constraints to the development of affordable housing that include: lack of housing contractors throughout the state; housing construction costs (including labor and materials); residential home values in certain markets; lack of sufficient rental units in some communities; lack of residential units for homebuyers (both low income and market rate) in many communities; lack of infrastructure for development; and insufficient establishment and enforcement of building codes. Policies related to these must be evaluated as these barriers negatively affect both the private and public sectors in ensuring that proper affordable housing and residential investment is made available within communities throughout the state.

The State will continue to evaluate policies that can be implemented which will work to attract additional residential contractors, particularly those that are willing to construct moderate priced homes in

communities. The State will review whether or not there may be policy incentives implemented into State housing programs that may include: providing zero interest loans to contractors to build residential units; providing low priced or free residential lots for development; and also to provide additional points in housing applications for those applicants that compile lists of interested contractors that may work on projects if applications are funded. This approach could also be implemented at the local level and through education and outreach the State could help influence good decision making and policies that would work toward attracting more residential contractors in many underserved markets throughout the state.

The State will also continue to work with developers and contractors to identify any cost saving measures that might be appropriate to implement in order to save on the cost of materials and labor. Policies related to construction cost savings measures could be evaluated which could include increased collaboration between communities and affordable housing providers that utilize job training in their construction practices and thus are able to provide reduced price homes in communities.

The National Housing Trust Fund (HTF) is an affordable housing production program that will complement existing Federal, State, and local efforts to remove/ameliorate barriers to affordable housing and increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income (ELI) and very low-income households (VLI), including homeless families. Nebraska will use the HTF funding for affordable housing projects through three set-aside programs which will assist to ameliorate barriers to affordable housing for extremely low-income citizens.

Overall, the State will continue to evaluate public policy that may impact the value of residential units in certain markets; the lack of residential units; ways in which to improve residential infrastructure; and code enforcement assistance. All these items will move towards reducing additional barriers to affordable housing.

AP-85 Other Actions – 91.320(j)

Introduction:

The following are additional actions the State will take in the 2020 Program Year.

Actions planned to address obstacles to meeting underserved needs

All of the activities which will be funded under the State’s CDBG, HOME, HTF, ESG, HOPWA and programs funded under the State’s Nebraska Affordable Housing Trust Fund (NAHTF) and Nebraska Homeless Shelter Assistance Trust Fund (HSATF) will address obstacles to meeting underserved needs. The State will identify and respond to underserved needs as they arise from self-evaluation and citizen participation.

Actions planned to foster and maintain affordable housing

The Housing Priority of the Annual Action Plan addresses how the State attempts to foster and maintain affordable housing throughout the state. Actions planned include: developing additional rental housing; developing additional homeownership units; providing down payment assistance; providing owner occupied rehabilitation (OOR) activities, rental housing development, homeownership activities, and non-profit operating assistance.

Actions planned to reduce lead-based paint hazards

The State is committed to reducing lead based paint hazards. DED and DHHS will continue its efforts to educate CDBG, HOME, HTF, ESG, and HOPWA recipients on the dangers of lead-based paint, as appropriate. In addition, DED ensures that any Housing Program Guidelines contain information on the requirements for lead-based paint work practices and the requirement to have properly trained staff in order to properly mitigate lead-paint hazards as necessary.

DHHS, through the Division of Public Health’s Lead-Based Paint Program, will coordinate with DED for training, education, and other resources related to lead based paint hazards, and will require the that grantees and subgrantees utilize staff and contractors that have the appropriate training and certification.

Actions planned to reduce the number of poverty-level families

Many agencies throughout Nebraska actively pursue the elimination of poverty. The role that DED and DHHS perform in this overall endeavor is to foster and promote self-sufficiency and independence. To better empower individuals and families toward self-sufficiency and independence through CDBG, HOME, HTF, ESG, & HOPWA may be used and the following strategies will be put to work:

- Promote sustainable economic development through affordable housing and other community development activities;
- Evaluate projects, in part, on the basis of their ability to foster self-sufficiency when awarding funding for projects;
- Maintain a strong relationship with the Continuum of Care system in order to enhance and promote the stabilization of homeless families and encourage transition to stable households and housing situations;
- Explore partnership opportunities with other agencies that provide a range of services and activities that have a measurable, and potentially major impact, on the causes of poverty in their communities; and

- Enhance efforts to educate the public and interested persons about available supportive services that foster self-sufficiency and independent living arrangements.

Actions planned to develop institutional structure

The State is committed to improving institutional structures. The institutional structure for the CDBG, HOME, HTF, ESG, and HOPWA Programs is composed of DED, DHHS, local governments, nonprofit organizations, and private industry. It is essential that these entities efficiently work together. Some examples include within the rental housing program (through the collaboration between NIFA and DED) and within the water/wastewater program (through the collaboration between DED and the Water/Wastewater Advisory Committee).

Actions planned to enhance coordination between public and private housing and social service agencies

DED works with NIFA through providing technical assistance and financing resources in the NIFA-led Collaborative Resource Allocation in Nebraska (CRANE) process, which works at developing housing projects that impact special needs and other underserved populations.

DED also coordinates regularly with the Nebraska Commission on Housing and Homelessness (NCHH) and is represented on various social service state advisory groups to ensure housing services are coordinated with social services for needy populations in Nebraska. DED continues to collaborate with DHHS, Public Housing Authorities, and homeless service providers throughout the state.

The Nebraska Homeless Assistance Program (NHAP) is housed within the infrastructure of DHHS. Being part of this collective organization, which includes Behavioral Health, Developmental Disabilities, Medicaid, Children and Family Services, and Public Health, allows for continued collaboration and coordination across the various disciplines in support of the delivery of housing and supportive service needs. NHAP requires a yearly plan that is part of the program application to outline how agencies are connecting homeless and at-risk of homelessness persons with mainstream services and how funded housing agencies connect with other social service providers in their regions.

Discussion:

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

Activities planned utilizing the CDBG funds expected to be available during the year are identified within the Method of Distribution. The following information identifies program income that may be available for use that would be included in additional projects that would be carried out.

Community Development Block Grant Program (CDBG) Reference 24 CFR

91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income, at the state level, that is available for use that is included in projects to be carried out.

In addition, Nebraska permits local units of government to retain program income, refer to Appendix, Section 2.2 for a list documenting local program income accounts within the non-entitlement. More information regarding all local program income accounts will be included in future annual action plans.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$300,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	\$300,000

Other CDBG Requirements

1. The amount of urgent need activities	\$1,500,000
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.0% of CDBG funds will be used to benefit LMI persons during 2019, 2020, and 2021

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

The State of Nebraska will not use HOME funds beyond those identified in Section 92.205.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

Refer to Section 3.1 of the Appendix for the full language of the resale and recapture provisions for the HOME program.

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

Refer to Section 3.1 of the Appendix for the full language of the resale and recapture provisions for the HOME program.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

The State of Nebraska does not have any plans to use HOME funds to refinance any existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment):

ESG written standards are a living document and as such, will be revisited, edited and updated as needed. The current versions of this document is posted at: <https://ccfl.unl.edu/community-services-management/resources/bos-coc-ne-500>.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system:

The BoS CoC has successfully implemented the Coordinated Entry system on January 17, 2018. NHAP is actively involved in the Coordinated Entry process through participation in the Coordinated Entry (CE) Planning committees and a standing member of the CE governing body. The Coordinated Entry manual, instructions and brochures can be viewed at: <https://ccfl.unl.edu/community-services-management/coordinated-entry>

Successful coordinated entry requires the participation of all housing and service providers in the community, participate in a designated process to coordinate entry to housing; including the use of coordinated referrals and triage, common applications, common entrance criteria and centralized lists.

The Coordinated Entry system:

- Diverts people away from the system who have other safe options for housing.
- Helps unclog the system by moving people more quickly through the referral process.
- Reduces duplication of efforts and help serve individuals better.
- Reduces frustration for service providers through targeting and engagement efforts.
- Quickly moves people from homelessness by connecting them to the most appropriate housing program available.
- Creates a more effective and defined role for emergency shelters and housing providers.
- Increases housing stability by targeting the appropriate housing intervention to correspond with the needs.
- Allows Continuum of Cares to be good stewards of limited resources.

The role and expectations of the CoC include:

- Overseeing body for the community-wide planning and coordination of programs for individuals and families who are homeless.
- The purpose and objectives of the Balance of State CoC are:
 - Gather information in order to identify and fill the gaps in services and community needs;
 - Protect and improve the lives and safety of the homeless and near homeless;
 - Actively engage homeless and other stakeholders in developing solutions to achieving self-sufficiency;
 - Communicate with funding entities, other organizations and the public at large to promote the general welfare of the homeless and to increase self-sufficiency; and

- Ensure full development of a continuum of care with the shelter, housing and programs necessary to meet the needs of all homeless people and efficiently and effectively move them to self-sufficient life.

The University of Nebraska Lincoln, Center on Children, Families, and the Law (CCFL) was designated by the BoS CoC as the Coordinating Entity. CCFL houses the Coordinated Entry Manager who is responsible for the day-to-day administration of the Coordinated Entry System, which includes but is not limited to the following:

- Create and widely disseminate marketing materials regarding services available through the Coordinated Entry System and how to access those services;
- Ensure training regarding Coordinated Entry is available to participating agencies. At a minimum, the trainings will cover:
 - Verification of chronic homelessness
 - Who to assess
 - How to administer the VI-SPDAT
 - Process and procedure for referring to coordinated entry
 - Review of policies and procedures
 - Assessments and prioritization
 - Criteria for uniform decision making
- Management of participant HMIS records;
- Ensure pertinent information is entered into HMIS for monitoring and tracking the process of referrals, including availability of resources, completion of assessments, and referrals made;
- Arrange case reviews to resolve rejections by housing programs and refusal by participants to engage in housing plans in compliance with the housing program guidelines;
- Manage appeals process utilizing protocol described in this manual;
- Manage processes to enable participation in Coordinated Entry by providers not participating in HMIS.
- Organize ongoing quality control activities to ensure function and performance remain accountable to participants, referral sources and homeless service providers throughout the Coordinated Entry process;
- Evaluate efforts to ensure Coordinated Entry is functioning as intended;
- Update Coordinated Entry system and process as determined necessary by a broad and representative group of stakeholders;
- Update Operations Manual as needed;
- Manage all public relations requests relating to Coordinated Entry.
- Provide open and transparent communication to referral sources, homeless and housing providers, and community members;
- Respond to email questions and provide guidance

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations):

The State NHAP (ESG/HSATF) program is awarded through a competitive application process. Announcements of funding opportunities are posted on the DHHS website and distributed to each regional CoC email list. For FY 2020, NHAP is in the 1st year of the 2 year funding cycle. See <http://dhhs.ne.gov/Pages/Homeless-Assistance.aspx> for further information on the 2 year funding

cycle and additional information regarding the process for allocation and distribution of the ESG and HSATF allocation.

Funding by geographic region is announced prior to the application process. Funding awards are based on input from the applicable CoC to ensure an inclusive array of services in the region and review of the applications received to meet service needs in each geographical region. The eligible applicants are units of general local government and individual non-profits, including faith-based organizations.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

All NHAP sub-recipients are expected to involve homeless or formerly homeless individuals on their Board or actively consult with them regarding ESG policies, funding and activities. The NHAP applications request narrative regarding the consultation of homeless or formerly homeless individuals which is evaluated as part of the review process. Furthermore, during on-site monitoring visits conducted by the State, NHAP sub-recipients are required to be able to demonstrate this assurance is being met.

Additionally, the BoS CoC has a formerly homeless individual who represents the 5 regions which comprise the BoS and participates in policy and funding determinations. The BoS CoC has also established a youth action sub-committee comprised of homeless and/or formerly homeless youth to provide input on funding and policy decisions. The youth action sub-committee also designates a representative to participate in the BoS CoC meetings to provide input on increasing engagement with youth-focused services.

5. Describe performance standards for evaluating ESG.

The primary goals the State strives for NHAP sub-recipients to achieve include reducing the length of homelessness, exits to permanent housing destinations and reducing returns to homelessness.

A performance report card with performance metrics has been established by the BoS CoC. Currently a report is issued through HMIS or comparable database for the victim service providers and distributed annually to all CoC and ESG grantees. NHAP has also incorporated these performance measurements into the annual application process as an evaluation component of the success of NHAP sub-recipients in reaching and achieving program standards. All NHAP subrecipients, including the City of Lincoln and the City of Omaha who are entitlement cities but receive NHAP Homeless Assistance Trust Funds, are required to submit their performance measures which are utilized to determine funding decisions.

Part of the performance measures specifically relate to housing stability and increasing economic self-sufficiency. With the housing stability information collected, the State and BoS CoC will jointly review and work to develop strategies which can help providers assist the homeless gain stable housing.

Discussion: See above

HOPWA Program

- 1. Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)**

Within Nebraska, the Nebraska AIDS Project (NAP) is the only AIDS Service Organization that provides case management services statewide to persons living with the HIV/AIDS disease. Because of this, DHHS awards HOPWA funds to NAP directly through a sole source contract deviation process. NAP serves as the project sponsor for the HOPWA Program and has offices located in Omaha, Lincoln, Kearney, Norfolk, and Scottsbluff.

Housing Trust Fund (HTF) Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds?

DED will distribute the HTF funds through applications submitted by eligible recipients.

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Yes, Nebraska will distribute HTF funds by selecting applications submitted by eligible recipients. Eligible Recipients include: local or regional non-profit 501(c)(3) or 501 (c)(4) housing or related service organizations; and public housing authorities that receive HTF assistance from the State as an owner or developer to carry out an HTF assisted project. In addition, to be eligible for HTF assistance, a recipient must:

1. Make acceptable assurances to the State that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;
2. Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
3. Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and
4. Have demonstrated experience and capacity to carry out an eligible HTF activity as evidenced by its ability to: own, construct, rehabilitate, and manage and operate an affordable multifamily rental housing development.

Supplemental Information regarding Distribution of HTF Funds and Uses of Funds

A. Forms of Assistance

Eligible uses of funds include: loans, grants, equity investments, and other State approved forms of assistance.

B. Allocations and Set Asides *(Please refer to Appendix 1.2 for the distribution of the allocation for the HTF program)*

1. Nebraska will reserve a portion of the State's annual HTF allocation to affordable single family and multi-family rental projects in coordination with Nebraska Investment Finance Authority (NIFA) through the joint DED/NIFA application for low income housing tax credit applications

within the LIHTC 9% application cycles. This allocation will be referred to as the "LIHTC 9% Set Aside".

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

2. Nebraska will allocate a portion of the State's annual HTF allocation for targeted needs housing projects funded with non-LIHTC resources. These projects will help determine how the State can develop smaller scale projects within areas of the state that are experiencing shortages of available housing for those populations with targeted needs. This allocation will be referred to as the "Targeted Needs Set Aside".

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

3. Nebraska will allocate the remainder of HTF funds for permanent housing projects for the homeless; persons at risk of homelessness; and other special needs populations, made available through 1) acquisition, rehabilitation, and resale of existing residential units or 2) rehabilitation of residential units for the creation of new permanent housing units, or rehabilitation of existing housing units, within the Omaha CoC; the Lincoln CoC; and the BoS CoC. This allocation will be referred to as the "Permanent Housing Set Aside."

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Yes, Nebraska will distribute HTF funds by selecting applications submitted by eligible recipients. 90% of the HTF funds will benefit extremely low income (ELI) households for rental housing and up to 10% will be used for state administration expenses. Rental housing activities may include:

- Acquisition and rehabilitation of existing housing units (for the creation of additional rental units for ELI persons);
- Rehabilitation of existing rental units;
- Adaptive re-use of existing buildings;
- New construction;
- Operating Cost Assistance (utilized with other rental housing activities); and
- Operating Cost Assistance Reserves (utilized with other rental housing activities).

Operating cost assistance and operating cost assistance reserves may be provided only to rental housing acquired, rehabilitated, reconstructed or newly constructed with HTF funds and DED will award no more than one-third of the state's annual grant to be used as operating cost assistance or operating cost assistance reserves. Operating cost assistance and operating cost assistance reserves

may be used for insurance, utilities, real property taxes, maintenance, and scheduled payments to a reserve for replacing major systems. The eligible amount of HTF funds per unit for operating cost assistance is determined based on the deficit remaining after the monthly rent payment for the HTF-assisted unit is applied to the HTF-assisted unit's share of the monthly operating cost.

Pursuant to §93.203(a) of the Interim Rule, HTF cannot be used for operating cost assistance reserves if HTF funds are used for the construction or rehabilitation of public housing units. The public housing units constructed or rehabilitated using HTF must receive Public Housing Operating Fund assistance under section 9 of the 1937 Act.

In addition, public housing is only eligible under HTF if the proposed project is part of HUD's Rental Assistance Demonstration (RAD) program, Choice Neighborhood Initiative Program, or involves the LIHTC Program. Priority will be given to projects creating new units.

- c. **Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

Threshold Requirements

When an application is received, it shall first be reviewed for eligibility to be scored and ranked. In order to be eligible for scoring and ranking, the application must be complete, must demonstrate that the proposed project at minimum meets the 7 housing selection criteria, and includes the following information, unless waived by DED for good cause. Application packages missing any of the following threshold items after the application deadline will be deemed incomplete and the applicant will be notified. Reasonable time will be given to the applicant to submit the missing information.

1. Submit a complete application to DED. After applications are submitted, DED will conduct a completeness review. The application will be deemed complete if the application package contains, at a minimum the following:
 - a. Required application forms submitted: all required DED-provided forms for current year application will be posted on the DED website prior to the beginning of the application cycle.
 - b. Required third-party documents submitted. A checklist and instructions of the complete list of required documents will be posted prior to application cycle.
 - c. Applicants must comply in all respects with DED Rehabilitation Standards as to content and adhere to any necessary HUD environmental regulatory requirements.

Subsequent to the completeness review applicants will be contacted via email regarding any missing and/or incomplete items or documents. Applicants must submit all missing and/or incomplete items or documents in order to be considered for funding.

2. Provide description, reference and/or supporting documentation that an eligible activity is proposed by the project according to the Nebraska HTF Allocation Plan eligible activity definition, which is that activities may include rehabilitation (including acquisition); preservation; new

construction; and operating assistance. These activities will benefit extremely low-income (ELI) households, at or below 30% of the Area Median Income (AMI).

3. Demonstrate the financial feasibility of the project.
4. Certify that housing assisted with HTF funds will comply with HTF requirements.
5. Demonstrate that the State requirement and HTF Regulations concerning a sustained 30-year affordability period is maintainable.

DED Housing Priorities and Scoring Criteria

HTF funds will be awarded to the applicants whose applications are complete, meet all requirements, and score the highest points until all HTF funds have been allocated. If there is a tie in the scoring of two or more applications the projects will be ranked in the following order to determine which applicant receives priority:

1. The application with the greatest amount of additional subsidy per unit;
2. The application with a proposed project under the Targeted Set-Aside or Special-Needs Set-Aside;
3. The most complete application as determined by the State's completeness review team.

DED reserves the right to deny HTF funding to any applicant or project regardless of scoring determination if the DED application evaluation determines a proposed project is not financially viable or feasible.

Application Process, Selection Criteria, and Scoring: The Seven Criteria of Equal Consideration

(Answering the relative importance of the readiness of projects in the selection process (the scoring), 'Undertaking Projects in a Timely Manner')

The Nebraska HTF Allocation Plan is designed to ensure that applicants will have the opportunity to compete for funding to address their unmet rental housing needs where economically feasible. The following seven selection criteria, all given equal consideration, will be used to determine HTF allocation of funds, and to evaluate and select HTF applications to be awarded HTF dollars.

Priority based upon geographic diversity: Geographic Diversity Criteria (up to 10 points)

Geographic distribution will be dependent on which HTF application cycle funds are being requested, as the discussion below demonstrates.

- **LIHTC 9% Set Aside**

For HTF applicants applying within the LIHTC 9% Set Aside, the entire state is the eligible area. The joint DED/NIFA application cycles for LIHTC 9% achieves geographic diversity by awarding 50% of available funds to projects in urban areas and 50% to projects located in rural areas. In addition, the scoring methodology assigns 3 points for a project located in a community population of less than 5,000, 2 points for a project located in a community population of 5,000 to 15,000, and 0 points for a project located in a community population of more than 15,000.

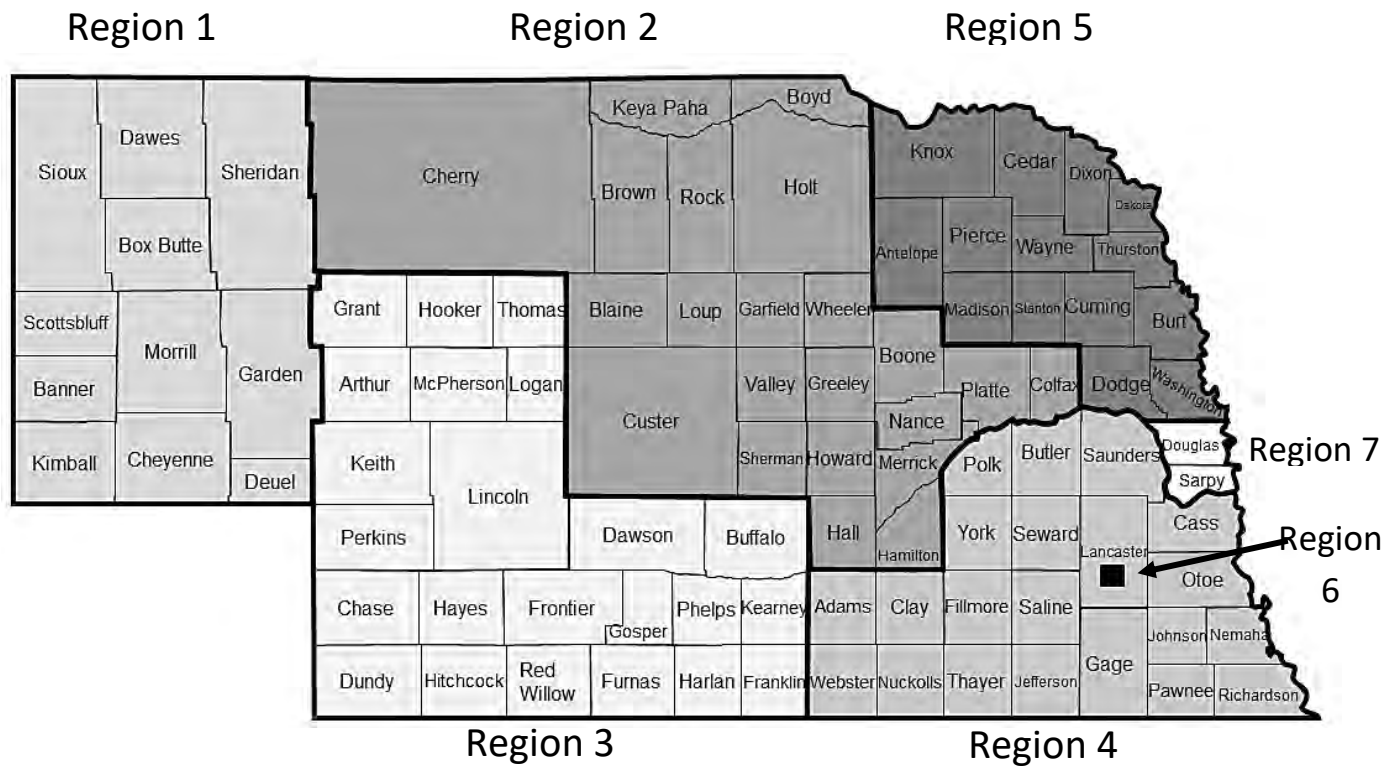
- **Targeted Needs Set Aside**

For HTF applicants applying within the Targeted Needs Set Aside, the entire state is the eligible area. While two of the three Set Asides do provide geographic diversity, the Targeted Needs Set Aside will not have a scoring hierarchy associated with geography. This is due to funding limitations and feasibility.

- **Permanent Housing Set Aside**

For HTF applicants applying for the Permanent Housing Set Aside, funds will be distributed equally between the Continuum of Care (CoC) Regions, which are the Omaha CoC, the Lincoln CoC, and the Balance of State (BoS) CoC. The Omaha CoC and the Lincoln CoC are regions located in the Southeast area of Nebraska, are approximately 60 miles apart, and are both urban communities. The BoS CoC consists of the remaining geographical areas of the state, where many rural communities exist, and which was formerly five separate NHAP regions, named after the remaining state geographical areas: the Panhandle, North Central, Southwest, Southeast, and Northeast CoC Regions of Nebraska.

Continuum of Care Regions



Nebraska Homeless Assistance Program (NHAP) Continuum of Care Regions

Balance of State:	Region 1, Region 2, Region 3, Region 4, Region 5
Region 1 Panhandle:	Sioux, Dawes, Sheridan, Box Butte, Scottsbluff, Morrill, Garden, Banner, Kimball, Cheyenne, and Deuel
Region 2 North Central:	Cherry, Keya Paha, Boyd, Brown, Rock, Holt, Blaine, Loup, Garfield, Wheeler, Custer, Valley, Greeley, Boone, Platte, Colfax, Sherman, Howard, Nance, Merrick, Hall, and Hamilton
Region 3 Southwest:	Grant, Hooker, Thomas, Arthur, McPherson, Logan, Keith, Lincoln, Perkins, Dawson, Buffalo, Chase, Hayes, Frontier, Gosper, Phelps, Kearney, Dundy, Hitchcock, Red Willow, Furnas, Harlan, and Franklin
Region 4 Southeast:	Polk, Butler, Saunders, York, Seward, Lancaster (excluding Lincoln), Cass, Adams, Clay, Fillmore, Saline, Otoe, Webster, Nuckolls, Thayer, Jefferson, Gage, Pawnee, and Richardson
Region 5 Northeast:	Knox, Cedar, Dixon, Dakota, Antelope, Pierce, Wayne, Thurston, Madison, Stanton, Cuming, Burt, Dodge, and Washington
Region 6:	City of Lincoln
Region 7 Omaha:	Douglas and Sarpy

Applicant’s ability to obligate HTF funds: Ability to Obligate Funds Criteria (up to 10 points)

Applicants will be evaluated on project readiness, including items such as local approvals, architectural plans, and site control. Describe the collaboration with the partners involved in the project, pre-development and post-award and how they assist in timely completion of the organization’s proposed HTF project.

Applicant’s ability to undertake eligible activities in a timely manner: Timeliness Criteria (up to 10 points)

Applicant will be evaluated on their capacity to undertake and complete HTF funded activities in a timely manner. This capacity is evaluated during the HTF application process. Capacity includes evaluating the entire development team, and considerations are made for experience with similar projects; financial and staff capacity; and other factors relevant to the role of the development team. These items include:

- Development staff experience, which includes financial and staff capacity
- Development contractor or partnering agency and their experience
- History of other federally-funded affordable housing projects, including number of projects and whether projects were completed in a timely manner
- Other relevant factors which demonstrate the ability of the team to ensure a successful timely project
- Readiness of the current project application
- Timeliness determined through the Threshold Requirements completion
- Letters of commitment and/or executed Memorandum of Agreement with all support services providers associated with the project

Property Portfolio – Describe the applicant’s portfolio of projects/properties that evidence competent management and oversight. Describe how the properties and the applicant’s development have adequate funding. If the applicant is not managing the property, please provide the management company and answer these questions for the management company.

Management Capacity – Describe how the current management has the ability to manage additional development activities. If the applicant is not managing the property, please provide the management company and answer these questions for the management company.

Project Management – Describe the procedures in place for monitoring the progress of the project.

For rental housing, the extent to which the project has Federal, State or local project-based rental assistance so units are affordable to extremely low income families: Project-Based Rental Assistance for ELI Criteria (up to 10 points)

Applicants will be evaluated on the number of project based rental assistance and tenant based rental assistance that is being provided for the project in order to ensure the affordability of rents for ELI families. Applicants must identify and describe the type of assistance and the length of commitment for the assistance in the project to demonstrate and ensure residents do not pay more than 30% of their income

towards rent and utilities. Other methods that ensure affordability of ELI households will also be considered, such as cross-subsidization or operating assistance reserves.

For rental housing, the duration of the units' affordability period: Affordability Period Criteria (up to 10 points)

Applicants must commit to keeping the HTF units affordable, including all applicable income and rent restrictions, for a period of no less than 30 years from the date of project completion. Applicants must submit appropriate verification and supporting documents to demonstrate their commitment.

The merits of the application in meeting the State's priority housing needs: Priority Housing Needs Criteria (up to 10 points)

HTF applications will be consistent with the State's Housing Priority Need which is to respond to the needs of affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska. The creation and preservation of residential units for extremely low income persons is consistent with the Housing Priority Need and also is consistent with a part of the Homeless Services Priority Need which is to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at imminent risk of becoming homeless.

HTF applications will be evaluated on how the priority housing needs as identified in the State of Nebraska 2020 - 2024 Consolidated Plan are addressed. That is, what objectives and under which priority need is the application addressing and fulfilling?

1. The Housing Priority Need is a need for affordable, decent, safe, and appropriate housing. There are four objectives associated with the priority housing need, of which only three are applicable to HTF dollars. Applications will be reviewed to evaluate which of the three applicable objectives are addressed:
 - a. Is the project application promoting additional affordable rental housing and preservation of affordable rental housing in selected markets?
 - b. Is the project application promoting housing preservation by improving the quality of Nebraska's existing affordable housing?
 - c. Does the project application enhance statewide understanding of fair housing law through outreach and education?
2. The Homeless Services Priority Need has been described previously and has two primary objectives. Applications will be reviewed and evaluated as to whether these objectives are addressed.
 - a. Does the project application provide appropriate shelter and/or housing to people who are homeless or at imminent risk of becoming homeless?
 - b. Does the project application provide needed services to people who are homeless or at imminent risk of becoming homeless?
3. Describe the local need and how the need was determined for the proposed HTF project and how it provides a solution to the immediate housing needs of the area being served.
4. Describe how the proposed project impacts the community.

The extent to which application makes use of non-federal funding sources: Non-Federal Funding Sources Criteria (up to 10 points)

Applicants will be evaluated on the quantity, quality, and timeliness of leveraged non-federal funding that will be committed to the proposed project.

The applicant must describe whether there are plans to apply for and/or anticipate a commitment of non-federal sources of funding, which must include the dollar amount, the source(s), and what percentage of the total development cost that the non-federal funding sources represent.

Describe the overall project financing for the proposed HTF project. Be sure to include a description of all resources into the project; these may include, but not be limited to: other grant resources (including rental assistance), matching funds, leverage funds, and in-kind funds.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Geographic distribution will be dependent on which HTF application cycle funds are being requested, as the discussion below demonstrates.

▪ **LIHTC 9% Set Aside**

For HTF applicants applying within the LIHTC 9% Set Aside, the entire state is the eligible area. The joint DED/NIFA application cycles for LIHTC 9% achieves geographic diversity by awarding 50% of available funds to projects in urban areas and 50% to projects located in rural areas. In addition, the scoring methodology assigns 3 points for a project located in a community population of less than 5,000, 2 points for a project located in a community population of 5,000 to 15,000, and 0 points for a project located in a community population of more than 15,000.

▪ **Targeted Needs Set Aside**

For HTF applicants applying within the Targeted Needs Set Aside, the entire state is the eligible area. While two of the three Set Asides do provide geographic diversity, the Targeted Needs Set Aside will not have a scoring hierarchy associated with geography. This is due to funding limitations and feasibility.

▪ **Permanent Housing Set Aside**

For HTF applicants applying for the Permanent Housing Set Aside, funds will be distributed equally between the Continuum of Care (CoC) Regions, which are the Omaha CoC, the Lincoln CoC, and the Balance of State (BoS) CoC. The Omaha CoC and the Lincoln CoC are regions located in the Southeast area of Nebraska, are approximately 60 miles apart, and are both urban communities. The BoS CoC consists of the remaining geographical areas of the state, where many rural communities exist, and which was formerly five separate NHAP regions, named after the remaining state geographical areas: the Panhandle, North Central, Southwest, Southeast, and Northeast CoC Regions of Nebraska.

See also the CoC map above.

- e. **Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

Applicants will be evaluated on project readiness, including items such as local approvals, architectural plans, and site control. Describe the collaboration with the partners involved in the project, pre-development and post-award and how they assist in timely completion of the organization's proposed HTF project.

Applicant's ability to undertake eligible activities in a timely manner: Timeliness Criteria (up to 10 points)

Applicant will be evaluated on their capacity to undertake and complete HTF funded activities in a timely manner. This capacity is evaluated during the HTF application process. Capacity includes evaluating the entire development team, and considerations are made for experience with similar projects; financial and staff capacity; and other factors relevant to the role of the development team. These items include:

- Development staff experience, which includes financial and staff capacity
- Development contractor or partnering agency and their experience
- History of other federally-funded affordable housing projects, including number of projects and whether projects were completed in a timely manner
- Other relevant factors which demonstrate the ability of the team to ensure a successful timely project
- Readiness of the current project application
- Timeliness determined through the Threshold Requirements completion
- Letters of commitment and/or executed Memorandum of Agreement with all support services providers associated with the project

Property Portfolio – Describe the applicant's portfolio of projects/properties that evidence competent management and oversight. Describe how the properties and the applicant's development have adequate funding. If the applicant is not managing the property, please provide the management company and answer these questions for the management company.

Management Capacity – Describe how the current management has the ability to manage additional development activities. If the applicant is not managing the property, please provide the management company and answer these questions for the management company.

- f. **Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

Applicants will be evaluated on the number of project based rental assistance and tenant based rental assistance that is being provided for the project in order to ensure the affordability of rents for ELI families. Applicants must identify and describe the type of assistance and the length of

commitment for the assistance in the project to demonstrate and ensure residents do not pay more than 30% of their income towards rent and utilities. Other methods that ensure affordability of ELI households will also be considered, such as cross-subsidization or operating assistance reserves.

- g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

Applicants must commit to keeping the HTF units affordable, including all applicable income and rent restrictions, for a period of no less than 30 years from the date of project completion. Applicants must submit appropriate verification and supporting documents to demonstrate their commitment.

- h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

HTF applications will be consistent with the State's Housing Priority Need which is to respond to the needs of affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska. The creation and preservation of residential units for extremely low income persons is consistent with the Housing Priority Need and also is consistent with a part of the Homeless Services Priority Need which is to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at imminent risk of becoming homeless.

HTF applications will be evaluated on how the priority housing needs as identified in the State of Nebraska 2020 – 2024 Consolidated Plan are addressed. That is, what objectives and under which priority need is the application addressing and fulfilling?

1. The Housing Priority Need is a need for affordable, decent, safe, and appropriate housing. There are four objectives associated with the priority housing need, of which only three are applicable to HTF dollars. Applications will be reviewed to evaluate which of the three applicable objectives are addressed:
 - a. Is the project application promoting additional affordable rental housing and preservation of affordable rental housing in selected markets?
 - b. Is the project application promoting housing preservation by improving the quality of Nebraska's existing affordable housing?
 - c. Does the project application enhance statewide understanding of fair housing law through outreach and education?
2. The Homeless Services Priority Need has been described previously and has two primary objectives. Applications will be reviewed and evaluated as to whether these objectives are addressed.
 - a. Does the project application provide appropriate shelter and/or housing to people who are homeless or at imminent risk of becoming homeless?
 - b. Does the project application provide needed services to people who are homeless or at imminent risk of becoming homeless?

3. Describe the local need and how the need was determined for the proposed HTF project and how it provides a solution to the immediate housing needs of the area being served.
4. Describe how the proposed project impacts the community.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Applicants will be evaluated on the quantity, quality, and timeliness of leveraged non-federal funding that will be committed to the proposed project.

The applicant must describe whether there are plans to apply for and/or anticipate a commitment of non-federal sources of funding, which must include the dollar amount, the source(s), and what percentage of the total development cost that the non-federal funding sources represent.

Describe the overall project financing for the proposed HTF project. Be sure to include a description of all resources into the project; these may include, but not be limited to: other grant resources (including rental assistance), matching funds, leverage funds, and in-kind funds.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A"

Yes.

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes.

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes.

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area. If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

During 2020, the State will adopt the maximum per unit subsidy limits used in the HOME Investment Partnerships Program. This will enable Nebraska and its development partners to obtain additional experience using HTF to create affordable rental housing for ELI households. These existing limits are developed for another program; are being adopted for the HTF program; and will meet the HTF requirements.

The HTF Maximum Per Unit Subsidy will be consistent with the current HOME Maximum Per Unit Subsidy Limits for Nebraska. The current limits include a calculation based on the Section 234 Basic (Elevator type) Limit up to 240%. This maximum subsidy is consistent with HUD guidance including information within CPD Notice 15-03 and HOME Fires Vol. 12 No 1.

The current HOME subsidy limits include:

PJs	HCP	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Base		\$ 63,881.00	\$ 73,230.00	\$ 89,049.00	\$ 115,201.00	\$ 126,454.00
All Nebraska and Iowa PJs/Counties	240%	\$ 153,314.40	\$ 175,752.00	\$ 213,717.60	\$ 276,482.40	\$ 303,489.60

The decision to use the HOME subsidy limits and apply them statewide is based on an analysis of the actual total development costs per unit of affordable rental housing properties in Nebraska for the past few years. While there is a variation in individual project costs, there is relatively little variation in the average per unit costs in various locations throughout the state, in both rural and urban areas. Because of the relatively consistent development costs throughout the state, Nebraska chooses to utilize the

HOME per unit subsidy limits as these limits are existing and an acceptable standard; are uniform; are familiar to the housing partners which utilize the resources; and are updated annually.

Below is further evidence to support the decision to utilize the above mentioned per unit subsidy limits:

	Wayne Crown II	Skyline Apartments	Horizon Estates	Eastbrooke Gardens
Location	Wayne	Norfolk	Holdrege	Kearney
Total Cost	\$2,955,514	\$14,068,822	\$3,745,435	\$6,805,958
Number of Units	15	92	20	32
Total Cost Per Unit	\$197,034.27	\$152,921.98	\$187,271.75	\$212,686.19
Unit Description	12 3-Bedroom units; 3 3-Bedroom market rate units	17 SRO units; 75 1-Bedroom units	20 3-Bedroom units	28 3-Bedroom units; 4 4-Bedroom units

Subsidy limits evidence continued:

	Ashland Affordable Housing	Eagle Heights	Garage Lofts	Belle Plaine Apartments
Location	Ashland	Omaha	Omaha	Bellevue
Total Cost	\$2,340,835	\$7,837,140	\$4,703,688	\$12,188,457
Number of Units	12	44	30	75
Total Cost Per Unit	\$195,069.58	\$178,116.82	\$156,789.60	\$162,512.76
Unit Description	9 4-Bedroom units; 3 4-Bedroom market rate units	12 SRO units; 13 1-Bedroom units; 14 2-Bedroom units; 5 3-Bedroom units	18 3-Bedroom units; 12 4-Bedroom units	30 3-Bedroom units; 30 4-Bedroom units; 8 3-Bedroom market rate units; 7 4-Bedroom market rate units

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below. In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

If the State intends to use its HTF funds for housing being rehabilitated, it must establish rehabilitation standards that all HTF-assisted housing undergoing rehabilitation must meet at the time of project completion in accordance with § 93.301(b). The standards must provide enough detail on what work is required, how that work should be performed and what materials should be used. The State's standards may refer to applicable codes or may establish requirements that exceed the minimum requirements of the codes. At a minimum, the rehabilitation standards must address:

- Health and safety;
- Major systems;

- Lead-Based Paint;
- Accessibility;
- Disaster Mitigation;
- State and local Codes, Ordinances, and Zoning Requirements; and
- Inspectable Areas and Observable Deficiencies from HUD’s Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing.

See also Attachments A, B, and C for further information on rehabilitation standards in the HTF Allocation Plan.

Indicate below if the State will use HTF funds for rehabilitation of housing.

X The State plans to use HTF funds for the rehabilitation of housing and has attached its rehabilitation standards to the HTF Allocation Plan.

Supplemental Information for Rehabilitation Standards

Additional information regarding DED Rehabilitation Standards is identified within the Attachments in the HTF Allocation Plan.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan.

The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population. The groups listed have also been identified in the action plan.

Supplemental Information for State Limited Beneficiaries or Preferences

A portion of HTF funds will be used for the creation and rehabilitation of permanent housing throughout the state. Within this distribution category, preference will be given to persons who are homeless; persons at risk of becoming homeless; and other special needs populations.

In addition, a portion of HTF resources will be used for the creation of additional housing for the targeted needs populations, including populations that may include: children aging out of foster care, and other populations that are extremely low income with housing shortages throughout the state. Preferences will be made for those populations served through the HTF Targeted Needs category.

Within the joint DED/NIFA LIHTC 9% cycles, a portion of HTF resources will be utilized. There are two cycles within LIHTC 9%. One cycle is the competitive cycle for applicants throughout the State of Nebraska. The other cycle is the CRANE cycle which gives preference to special needs populations as defined within the CRANE application. Currently this includes: Housing for individuals with special needs (such as physical or mental disabilities, substance abuse issues, homeless, or those experiencing severe economic distress), including housing for populations with incomes below 30% of the applicable Area Median Income (AMI). At least 30% of the units must serve individuals with special needs.

During the development of the State's HTF Allocation Plan, within the citizen participation process, several respondents identified the need for additional permanent houses for ELI persons and this was one of the reasons that the Permanent Housing Set Aside was established within the Allocation Plan.

In addition, within both the Consolidated Plan and the State's Annual Action Plan, the State discussed the need to continue to find ways in which to provide additional permanent housing for Extremely Low Income persons, including those who are homeless or at-risk of homelessness.

This limited beneficiary preference also supports the actions planned to reduce the number of poverty-level families which includes utilizing a strong relationship with the Continuum of Care system in order to enhance and promote the stabilization of homeless families and encourage transition to stable households and housing situations.

Other evidence that supports the need for creating a priority for permanent housing is through the findings within the State's "Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska" which is referenced in the State's AAP and also at: http://opportunity.nebraska.gov/files/crd/nchh/NCHH_OpeningDoors_StateofNE10YearPlantoPreventandEndHomelessness.pdf. Overall, there continues to be a significant unmet need for permanent housing throughout the state, particularly for ELI persons. HTF resources will be used to further decrease that unmet need.

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

Discussion:

See above and refer to the Appendix.

Appendices

Appendix 1.1 | Estimated Allocation Table

Source	Funding Sources							Total
	CDBG Federal	HOME Federal	HTF Federal	ESG Federal	HOPWA Federal	NAHTF State	HSATF State	
Total 2020 Allocation	\$11,041,449	\$3,961,592	\$3,000,000	\$1,009,899	\$608,401	\$10,300,000	\$2,750,000	\$32,671,341
<i>State Administration, Operations, & Technical Assistance</i>	<i>\$431,243¹²</i>	<i>\$600,000¹³</i>	<i>\$300,000¹⁴</i>	<i>\$75,742¹⁵</i>	<i>\$35,956¹⁶</i>	<i>¹⁷</i>	<i>\$75,000¹⁸</i>	<i>\$1,517,941</i>
<i>2020 Allocation available to Eligible Applicants</i>	<i>\$10,610,206</i>	<i>\$3,361,592</i>	<i>\$2,700,000</i>	<i>\$934,157</i>	<i>\$572,445</i>	<i>\$10,300,000</i>	<i>\$2,675,000</i>	<i>\$31,153,400</i>
Total Prior Year Resources Not Obligated	\$5,739,508	\$3,228,650	\$5,130,195	\$0	\$0	\$0	\$0	\$14,098,353
Program Income	\$6,805,748	\$0	\$0	\$0	\$0	\$0	\$0	\$6,805,748
Total Funding Available	\$23,586,705	\$7,190,242	\$8,130,195	\$1,009,899	\$608,401	\$10,300,000	\$2,750,000	\$53,575,442
Total To Distribute To Eligible Applicants	\$23,155,462	\$6,590,242	\$7,830,195	\$934,157	\$572,445	\$10,300,000	\$2,675,000	\$52,057,501

¹² A portion of the 2020 allocation resources is reserved for state administration and technical assistance funds combined that may not exceed 3% of the total base allocation plus \$100,000 as per 24 CFR 570.489(a).

¹³ Nebraska has been granted a statutory suspension and regulatory waiver in order to respond to the COVID-19 pandemic to use up to 25% of its HOME fund allocation towards administrative and planning costs.

¹⁴ Up to 10% of the allocation will be used for state administration.

¹⁵ 7.5% will be set aside for state administration to provide technical assistance and program support.

¹⁶ Up to 3% of the allocation can be used for state administration (\$18,252) and funds are also being reserved to maintain the case management software (\$17,704).

¹⁷ State Administration for the NAHTF program comes from the State of Nebraska's main line budget bill for the biennium.

¹⁸ Per State statute 68-1601 to 68-1608, up to \$75,000 may be set aside for administration costs.

Appendix 1.2 | Estimated Categorical Distribution Table

Funding Source	Priorities						State Administration	Total
	Affordable Housing	Community Development	Economic Development	Public Service	Homeless Services	HOPWA Services		
CDBG (Allocation/Carryover)***							\$431,243	\$16,780,957
<i>Downtown Revitalization</i>		\$2,199,714						
<i>Economic Development (infrastructure)</i>			\$1,100,000					
<i>Job Training (youth)</i>				\$350,000				
<i>Owner Occupied Rehabilitation</i>	\$4,000,000							
<i>Planning</i>		\$400,000						
<i>Public Works</i>		\$4,500,000						
<i>Tourism Development</i>			\$1,500,000					
<i>Water/Wastewater</i>		\$2,300,000						
CDBG State RLF								\$6,805,748
<i>Economic Development (non-infrastructure)</i>			\$2,722,299					
<i>Emergent Threat</i>		\$4,083,449						
HOME							\$600,000	\$7,190,242
<i>CHDO Project</i>	\$1,500,000							
<i>CHDO Operating</i>	\$300,000							
<i>LIHTC Competitive and CRANE</i>	\$4,790,242							
HOPWA						\$572,445	\$35,956	\$608,401

Funding Source	Priorities						State Administration	Total
	Affordable Housing	Community Development	Economic Development	Public Service	Homeless Services	HOPWA Services		
ESG (NHAP)					\$934,157		\$75,742	\$1,009,899
HSATF (NHAP)					\$2,675,000		\$75,000	\$2,750,000
HTF							\$300,000	\$8,130,195
LIHTC 9%	\$1,130,195							
Permanent Set Aside	\$4,300,000							
Targeted Needs Set Aside	\$2,400,000							
NAHTF	\$10,300,000						**	\$10,300,000
TOTAL	\$28,720,437	\$13,483,163	\$5,322,299	\$350,000	\$3,609,157	\$572,445	\$1,517,941	\$53,575,442

*Amounts include the 2020 allocation, carryover from previous years, and program income.

** State Administration for the NAHTF program comes from the State of Nebraska's main line budget bill for the biennium.

***The estimated CDBG carryover is \$5,316,897, this amount contains funding from the 2019 allocation which is required to be obligated within 15 months of the executed grant agreement. During the last three months, as described in the 2019 Annual Action Plan these funds may be reallocated to other categories as needed to ensure timely distribution.

Appendix 1.3 | 2020 Application Cycles

Funding Source	Application Cycle
Community Development Block Grant (CDBG)	
<ul style="list-style-type: none"> ▪ Downtown Revitalization 	1 st Cycle: September 15, 2020 2 nd Cycle: To Be Determined
<ul style="list-style-type: none"> ▪ Economic Development 	Open Cycle: begins July 1, 2020
<ul style="list-style-type: none"> ▪ Emergent Threat 	Open Cycle: begins July 1, 2020
<ul style="list-style-type: none"> ▪ Job Training (Youth) 	Open Cycle: begins July 1, 2020
<ul style="list-style-type: none"> ▪ Owner Occupied Rehabilitation 	Pre-Application: July 30, 2020 Full Application: September 30, 2020
<ul style="list-style-type: none"> ▪ Planning 	1 st Cycle: August 30, 2020 2 nd Cycle: To Be Determined
<ul style="list-style-type: none"> ▪ Public Works 	1 st Cycle: August 15, 2020 2 nd Cycle: To Be Determined
<ul style="list-style-type: none"> ▪ Tourism Development 	Open Cycle: begins July 1, 2020
<ul style="list-style-type: none"> ▪ Water/Wastewater 	Open Cycle: begins July 1, 2020
HOME Investment Partnership	
<ul style="list-style-type: none"> ▪ CHDO 	September 30, 2020
<ul style="list-style-type: none"> ▪ LIHTC 	1 st Round and 2 nd Round posted here: https://www.nifa.org/res-dev/application
<ul style="list-style-type: none"> ▪ CRANE 	Open Cycle
Housing Opportunities for Persons with AIDS (HOPWA)	
	Open Cycle
NHAP (Emergency Solutions Grant/ Homeless Shelter Assistance Trust Funds)	
	May 26, 2020
National Housing Trust Fund	
<ul style="list-style-type: none"> ▪ LIHTC – CRANE 	Open Cycle
<ul style="list-style-type: none"> ▪ LIHTC – Competitive 	1 st Round and 2 nd Round posted here: https://www.nifa.org/res-dev/application
<ul style="list-style-type: none"> ▪ Permanent Set Aside 	Open Cycle
<ul style="list-style-type: none"> ▪ Targeted Needs Set Aside 	Open Cycle
Nebraska Affordable Housing Trust Fund	
<i>Housing Projects & Non-profit Technical Assistance Cycle</i>	
<ul style="list-style-type: none"> ▪ Pre-Application 	March 12, 2020
<ul style="list-style-type: none"> ▪ Full Application 	May 13, 2020

Nebraska Analysis of Impediments Public Input Meeting Transcript Presentation

Thank you so much for joining me for the 2020 State of Nebraska Analysis to Impediments of AI or Analysis of Impediments to Fair Housing Choice for the kind of the part of the whole consolidated planning process. We're in Lincoln last week doing this very same presentation. We had some good comments and we hope to hear some excellent comments from you. Everything that I have in this presentation, which will be made available on the website, or you can send me an email and I'll forward you a copy after this will be already in the report. So really, the main purpose of this today's meeting is to share some preliminary findings and hear of any concerns that you may have, or comments or, you know, insights into barriers and Fair Housing Choice, like said, if you write them down on the question they'll show up there or the chat or you know, you can feel free to just speak up. I believe this is all being recorded as well. So that's full disclosure, full disclosure. All right. So, like I said, the intent of this meeting is to review some fair housing protections, introduce you to the Affirmatively Furthering Fair Housing rule and its immediate demise or nearly immediate demise. Show some fair housing data and maps, gain some input on the perspective to help shape the AI draft plan and emphasize the 2019 or 2020 now, fair housing survey. If you haven't taken the survey, please do. We'll have the survey link for you here. And if you have taken the survey, thank you so much forward it on to your friends, your family, those in your professional network, anyone that you know, anyone living in Nebraska that might have some input, or just like to learn a little bit more about fair housing.

So fair housing protections, Federal and State Fair Housing Acts protect several groups and housing transaction. Federal Rules are federal protected classes race, color, national origin, religion, gender, familiar or marital status and disability. There are several other states across the country or jurisdictions that have additional protected classes, but these are the ones that are protected in Nebraska. I have heard throughout my travels that this list is too short things that I have heard that that have expressed need, and you may or may not agree with them our source of income I have heard as a protected class. So, Housing Choice vouchers, section 8 recipients that is currently not protected. Veteran status I've heard should be a protected class and returning citizens or those with a criminal history, often faced housing problems or you know, issues in securing housing. Those currently are not a protected class. If you believe they should be, we can, you know, add it to the comment, I just those are the most the most common additional protected classes that I have heard throughout my travels.

But this is what we have in Nebraska as of today. So, State of Nebraska Analysis to Impediments to Fair Housing, this is a statewide report if you are at my earlier webinar or saw me in Lincoln, the Consolidated Plan, which is kind of this is kind of a part of is just the non-entitlement areas of the state. All the data in this presentation and actually in the AI report itself will be statewide data because fair housing is a statewide issue, especially in a couple of Omaha and Lincoln has some RCAP/ECAP areas that we'll see a little bit later in the presentations, however, so entitlement jurisdictions receive federal funding from HUD must certify that they are Affirmatively Furthering fair housing as a condition to receive grants. So, it's kind of part of the consolidated planning process, outside of that a little bit but it has to be filed at the same time. So, over the past 20 years, AFH meant preparing and Analysis to Impediments to Fair Housing Choice in AI. You conducted in AI, you identified barriers to Fair Housing Choice, and you took actions on those impediments if any impediments or barriers were found, and you maintain records of those actions. In 2015, HUD rolled out a thing called the AFFH. And part of this AFFH thing, they changed a couple of the language, we have local knowledge, identify fair housing issues instead of barriers and contributing factors

to those issues instead of impediments and we prioritize fair housing goals. Part of this whole AFFH rollout is a HUD use this on created an online assessment tool with all the data that anyone or jurisdiction should be able to use to identify fair housing issues and contributing factors.

There was a couple issues with the data set number one and it relies heavily on the 2009 to 2013, American Community Survey data, those of us who were around then I'm guessing all of us were because that was wasn't too long ago that is the height of the Great Recession. So, the 2009 to 2013 ACS data shows a starkly different landscape, economic demographic housing landscape them where we find ourselves today. Also use the 2009 to 2013 CHAS data, Comprehensive Housing Affordability Strategy data set. Again, that's a very different time and you know, economic demographic housing trends that we find ourselves in today. So, what we did is we reverse engineered all the data, we are able to, to, you know, manufacturer reverse engineer in the HUD AFFH data set using the most recent Census data and the most recent CHAS data. So, we use the AFFH you know, data frameworks, but with the most recent data, except for a couple indices. That we'll see here that we had to use the original AFFH dataset. So, the operating context is a fair housing issue is a condition that restricts Fair Housing Choice or access to opportunity. Alongside this AFH data set roll out they had this kind of new concept called access to opportunity, and they were trying to measure those are fair housing issues. So, access opportunities, kind of quality of life there. They're trying to get a quality of life metrics ease and how those may vary based on race or ethnicity. Contributing factor creates contributes to or perpetuates increases the severity of fair housing issues that were identified in the first one, and a fair housing goal or things that are committed to and must be done for the AFFH required. Okay, so they put all that out. It was supposed to be easy for jurisdictions to do themselves, but it wasn't, it was rather confusing. A lot of the concepts that they tried to, you know include in this data set are just a little confusing, especially for the general population there took me a little while to get my head around as well. I'll walk you through a lot of those. So, they decided to suspend the rule. So, until further notice, and they have put out a notice that they actually might just completely get a do away with all these things. But where we are now, we have to do an AI we have to file that the old way of Analysis to Impediments to Fair Housing Choice identifying impediments, but we have to do it through an AFH framework. So, we have to include these as these additional AFFH data concepts that were put out in this online assessment tool. And we'll work through we'll work through what those are and what they look like.

So, the AI/AFFH report will have an executive summary and we'll talk about the community participation process of which now you are involved in which is great, thank you so much for showing up. We were also like I said in Lincoln doing the same presentation last week, we had some great comments and great turnout there. We also have a fair housing survey running the second time I said it, I'll say it at least 10 more times. If you haven't taken it, please do if you have thank you, forward it on. We look at past goals and actions and we kind of see what's going on. And we have analysis and we develop goals and priorities and any tendencies if we need them. The community participation process, like I mentioned to is we have a fair housing survey. We had a fair housing forum, and we're having professional fair housing focus groups we're at now and then there'll be a public review meeting in March. So, keep your ear out for that one. So, after the initial findings and all the analysis and public input have been, you know, coalesced and distilled down into factors and recommended actions, we come back and we share them with the public and offer one additional opportunity for people to chime in on. So, HUDs fair housing issues, here we have seven of them are segregation analysis. They try to quantify this through what is known as the dissimilarity index will run through that in a further slide, RCAP and ECAP area. So, RCAP stands for up here racially concentrated areas of poverty and ethnically concentrated areas of poverty. And the United States Census as we'll see in a bit, you have a race and ethnicity. So, they separate them out disparities and access to opportunity. And those are the based on the several indices in the AFFH data set. That unfortunately, we

were unable to recreate everything else we were able to redo except for these access to indices, but we'll work through them later in the presentation as well. Disproportionate housing needs relies on the CHAS community or Comprehensive Housing Affordability Strategy dataset that is produced by HUD for the consolidated planning purpose. It's a special tabulation from the US Census Bureau and pays the Census. So, I don't know how that all works, but it comes out and it's a big, big lot of the tables, C is for comprehensive. So, we'll walk through that, but it shows housing needs by several you know, household characteristics, one of which is race. So, we can see if there's a racial or ethnic breakdowns that are experiencing disproportionate housing needs. We look at publicly where the publicly supported housing is. Is it clustered in RCAP/ECAP areas? Is it not? We look at disability and access analysis. A lot of people think about fair housing as based in race, fair housing complaints, you know, when they're filed, or actually the majority of them are file with a basis in disability, folks, persons with a disability that can, you know, reasonably accommodate their dwelling units or something like that. There's a lot of a lot of fair housing issues actually, in the, you know, our disability are based in disability, as we'll see later, and fair housing enforcement, outreach, etc. So, these are the issues that we're going to work through the purpose of today's meeting, we review some socio economic context, we present a bunch of data. We do a lot of data analysis based on the Census and the AFFH data set and the CHAS data excuse me, we look at segregation and RCAP/ECAPs, discussed disparities and opportunity discuss disability and address fair housing enforcement and outreach. Like I said, this is a statewide report. Instead, the Consolidated Plan that we were focusing on earlier is not entitlement areas. This is the state wide as a whole. And we see a pretty decent, you know, almost linear population growth rate. For the State of Nebraska, it's good to go up population growth is a good thing. So that's so that's good slide.

And here we go population by race, race and ethnicity, 2010 Census and the 2017, five year American Community Survey. So anytime you see a table like this, we just I just want to walk you through how to actually read this table. Since so this is the 2010 Census. The Census is a count of all the people in the country or your city or everything. It's a total count. A 2017 five year American Community Survey is a survey. So, it's a sample size, they send out forms and people fill the forms back in and they send it out. So, the methodologies are different. Because the methodology between the two are different, you can't actually compare the numbers between the two time periods. So, you can't actually look at the population in 2010, compared to the population in 2017, five year ACS, but what you can do is you can look at the percentage of total and compare those across the two time periods. So, we see here the white population in the State of Nebraska, rose from 86.1% of the population to 87.8% of the population, African American household or birth population also rose from 4.5 to 4.7%. And then we see here non-Hispanic and Hispanic because in the United States Census, you have a race and an ethnicity. So, you can identify as white, non-Hispanic, white, Hispanic, black, non-Hispanic, black, Hispanic, so you have both a HUD, the CHAS dataset that actually puts them together, which is a little confusing. We'll talk about that later on. We see here that Hispanic households also increased from 9.2 to 10.5% of the population. So, breaking over 10% in the most recent 2017 five year ACS. Now when you take the Census or the American Community Survey, they summit together and what are known as summary levels, some levels, the very smallest geographic area and the Census is called the block and that corresponds to a city block; city blocks are pretty small. So, they add those up together, they add a bunch of groups of city blocks together to make a block group. Block Groups are also still pretty small. So, they added up to one more level. See if I can get into the camera there, we go to Census tract level. Now this is a map of Census tracts. Census tracts are also they add the blocks and block groups together, they try to get a roughly equivalent population in the size of Census tract. So that's why you see, you know, Census tracts and more rural less popular, less sparsely more sparsely populated areas having larger Census tracts, you know, some counties only have two Census tracts, when we get into Omaha or Lincoln, density, denser population Census tracts are much, much smaller to kind of equate the population size to across the two. So here a percentage of

concentration of white households. You know, overall, we're seeing 87.8% of all population in Nebraska are white, so this white population, there are some pockets reaching 99.1 to 100% white population. There are some notable the notable thing about this maps are the lower levels where we have less concentrations white population here and over here. And then we'll see about that. African American population concentrated pretty heavily in just more urbanized areas. Omaha it's kind of hard to see in Lincoln and along the I-80 corridor, Hispanic population also there's a couple pockets of higher kind of concentrated Hispanic population. The blue purple is 49.8 to 80.2% of all persons in those Census tracts are Hispanic. So that's actually a pretty big concentration area. You can see some here. They're kind of hard to see on a statewide map. But there we go. Don't have American Indian. Oh my goodness. I don't know why we don't have American Indian in here, but I can show like these two Census tracts up here are high concentrations of American Indian population as well. And also, on the border up here with the reservation. Okay, so uh, oh, things are going crazy. Alright. This is a poverty by age in the 2010 Census, they did not ask about your income. They decided to take the income question out of the Census and put it in the American Community Survey with the idea that it would roll every year. They changed the poverty question and the ACS data. So, they we will so they weren't able to we weren't able to get anything besides the most recent ACS stuff, and the 2000 Census, unfortunately. Here we see a percentage of population in poverty for the entire state rose from 9.7 to 12%. That's pretty big time period. A lot happened between then and there. So, it's not too surprising that we see a poverty rate increase, although that rate isn't increasing too high compared to other places that I've seen. Concentrations of poverty throughout the state against Census tract level mapping. We see here some higher concentrations, and this is this does have some higher concentrations of Native American Indian households there. You can probably you probably can't see it, because we have the sign there, but they're also high concentrations, you know. Housing units by tenure. Okay, how you read this chart, this is kind of a nested table we see occupied plus vacant equals total housing units. Total housing unit is a physical housing structure. It's a single family unit, apartment, mobile home. triplex duplex whatever you can live in it a boat. That's cool. That's in there. I did here. And Nebraska has the largest coastline of rivers out of all the states in the country. That's the word on the street. Anyway, so once you move into a housing unit it becomes occupied, or a household, which is up here and then if it's occupied is either renter occupied, or owner occupied. So, we see here that the percentage share of owner occupied housing fell slightly from 67.2 to 66%, of the total of all occupied housing units households, commercially, the renter occupied household rose from 32.8 to 34%. This is the 2017 five year American Community Survey. So, it's averages over the last five years. So we do see, you know, it's still got a little bit of the post-recession or a little tail end of the recession, post-recession recovery, and we did see over that period of people switching slightly from single family to rental units, however, so that that's why we kind of see that that bit of a shift there. Vacant housing units fell actually from 9.5 to 9.2% of the total housing stock in the state. So that that's good to see that fall, households by income. Now, we do see here that the income of the households actually, you know, we do see less than 15,000 fell from 12.2 to 10.1%. And then that trend kind of continues, most of the lower income household's kind of fell. And then we see here at the very top end 75 to 99 rose from 12.8 to 13.4, and \$100,000 or more rose, pretty big actually 16% to 22.9% of the household. So, we do see incomes or at least income bracket, household incomes rising as percentage share the total population. However, this data is not adjusted for inflation, so dollars over here on the 2017, five year Americans you survey are worth less than the dollar is in the 2010 five your ACS. So that inflation certainly plays a role in that, you know, increasing cost of living and things like that, but not that big of a jump, and that that's a pretty big percentage jump up for that for that income breakdown. Okay, households by year home built and we see here the majority are, you know, there is a couple years where housing stock was built first 1939 or older, counts for a 20.2% so roughly a fifth of all housing stock in Nebraska was built before 1939. And we see another kind of big building year well 1960 to 79 if you put those together, that's also pretty big 1979, 16.3% of the housing stock was built their cc so a lot of stuff built before 1939 from the 60s to the 80s or

1979 also kind of a big, a big one. And then we see some additional units are bigger units built in 1990, 1999, and 2000, then 2009 11.9 and 12% of the Nebraska housing stock. So, we see a couple of clusters of decades where we see some bigger housing stock built. So this is owner occupied by median family and we see here, you know, so just remember, one fifth was building 30 in the 30s, or earlier 60s, 70s and 2000. So, we see here, the earlier stuff 1939, the majority, majority fifth the housing stock had a median value of about \$92,000. When we kind of go down as the, you know, the year structure build increases, so does a median value. So, we see another kind of bigger year in 1979, \$141,000 was the median value, then we kind of go up again and we see the 2000 to 2009, \$227,000 and things are kind of really increasing but it's time to get to 2014 or later. median value of a structure bill was up to \$330,000. So that's a that's a quite a big increase as so basically as the newer structures are built, newer units are normally bigger, and they command a higher premium. Okay, so now we're diving into HUD AFFH land. This is a what is known as the dissimilarity index. This came out of that HUD AFH online interactive or online assessment tool that they put together. It's a way of measuring or you know, there is a way of measuring segregation according to HUD, what it actually measures is how, how a lower level geography, how similar or dissimilar, a lower level area compares to a higher level area. That's why it's called the dissimilarity index and the legend they use the dissimilarity index and convert it then to segregation. Okay. The formula that you use is over here on the right if that's not your thing, don't worry, it's my thing. That's why I'm here pointing at it. Basically, it's you know, it evaluates how smaller level areas, in this case Census tracts, compared to the State of Nebraska. I just want to point out here that this equation is very sensitive to this i here we chose a Census tracts j, the state, if this I was a block group or a block, immediately you get higher segregation boundaries, instead of we decided and this is statewide analysis, maybe Census tracts are too small, we should just use counties. You know, there's 93 counties in Nebraska, we can do that. The segregation would immediately decrease because most counties look almost identical to the state. So, we do Census tracts and happy median. It's just highly sensitive to that. I just wanted to point that out. We do, however, see once we run the numbers that African American households have a dissimilarity index rate of above 60, which corresponds according to HUD to high segregation, but between 2010 and most recent 2017 ACS we do see a decrease, slight decrease in the dissimilarity index. We also see an American Indian households, we do see an increase rising from above 50, which is, you know, in the moderate segregation area, almost a 60. So according to the similarity index, we see increasing levels of segregation among American Indian Native American households. Hispanic households, moderate levels of segregation were about, you know, under 50. This between this 40 and 54, down here moderate levels of segregation, and that remained pretty constant over the 2010 to 2017 five year ACS. So, quick recap was the slight decrease, I mean, highly segregated African American populations but decreasing. Increasing American Indian segregated populations and Hispanics, moderately segregated but remaining the same. According to this according to the dissimilarity index put out by HUD. RCAPs and ECAPs we see here our RCAP is a racially concentrated area poverty and ECAP is an ethnically concentrated areas of poverty. This again comes out of the AFH dataset, excuse me, and the equation to determine if your RCAP or ECAP is down here. Again, that's not your thing, don't worry. It basically says you have to fill two conditions Census tract must fulfill two conditions to become an archive RCAP/ECAP, the first of which is you have to have a poverty rate of above 40% or three times jurisdiction average, which in this case was 12%. So that's 36%. So, or you must have a popular nonwhite population of above 50%. So, if you fulfill those two conditions, a high poverty rate above 40 or 40%, or three times jurisdiction average and a non-white population of above 50%. The reason that we have an RCAP is if that non-white population is based on race, or an ECAP is that non-white population is basically non-Hispanic. So that's why they're there two. We put these together our RCAP/ECAP. And we kind of blew up the map so you can see otherwise would be totally lost, see some our RCAP/ECAP areas, RCAP areas in Omaha and a couple in Lincoln. So, there's just, you know, showing us that we have some higher, you know, concentrations of poverty and non-white areas. So that's our RCAP/ECAP barriers, disparities in access to opportunity. So, these again,

came out of the HUD AFH data set. That's why we're kind of doing the AI but through an AFH framework. That's where these come in, again, access to opportunity, they tried to measure a couple of different metrics, these metrics, ease about quality of life indicators, so they put them together. Quick note that these are a lot of these are very, you have to know what the definition is to get a get your head around them. They're relatively narrow in scope. So Just be aware of that. So also, one of the to normalize everything we're up is good. So, a high low poverty index is good. So, the higher low poverty you are, the better. low low poverty is not as good. So, school proficiency is up. School proficiency only evaluates the performance on fourth grade students on state exams has nothing to do with you know, high school graduation rates, college acceptance rates, anything like that. It's just fourth grade statewide tests. Okay, job proximity is kind of a function of us. This is job locations with a CBSA. Labor market and get engagement attempts to measure human capital in the neighborhood. Now, the two transportation costs indices, the low transportation costs and the transit trip costs only evaluate the transit costs or the transit trips for a three person, single parent family with incomes at 50% of the median income for renters. So, it's only renter households at 50% of the median family income that three persons, single family, parents, so mother or father and two kids living at 50% of the median income renting. And that's for low transit costs and transit trips. I think they wanted to do that because they wanted to dial in on the, the, you know, the portion of the population or the selection of the population that needs to use public transportation to get to where they need to go. They might not have a vehicle or might not be able to afford a vehicle. So that's why I think they're trying to just be so narrow on those two transportation costs in this transit, transportation costs and transit trips. Environmental Health summarizes potential exposure to harmful toxins and neighborhood level. But those are only airborne toxins based on EPA data, neurological, cancerous, and some other things in the air. Nothing to do with lead in your walls or letting your pipes. So, there's an indoor health hazards. It's an outdoor health hazard. So, HUD puts all of that together and they give each Census tract a score. And then, you know and have based on this and they also see, you know, what racial characteristics are in that Census tract. So, we do see here according to the disparities and access opportunity that, you know, there are some areas where African American households and Native American households are suffering disparity in access to opportunity. African American households are the orange yellow one, American Indian Native American households are the purple line. And we see here that the white non-Hispanic and Asian on Hispanics have relatively high low poverty Index, which is good and then we see African American, Hispanic and Native American having low lower poverty indices. School proficiency indices, fourth grade tests, only fourth grade tests, but it's data it is data points so we can evaluate it. And we see here that African households, Hispanic households and Native American households all have the disparity in access to school proficiency indices. Then we kind of see here again, in the labor market, same sort of trend where white households and Asian non-Hispanic households have a higher labor, labor force indices. But then things kind of switch where we get into transportation and transportation costs. White households' kind of fall below that African American and Hispanic, but Native American is still kind of low on those two, and we have jobs the job, human capital is kind of the same or that I think that's job, that's the core base statistic one. So that's just, you know, by jobs or not, that's all pretty relative. And then the hazard index, we do see that Native American households actually live in the cleanest air, they have the cleanest air according to this, white households also have, you know, low a higher hazard index, which is low hazard. Okay. So, you know, we do see some disparities and access to opportunity based on you know, racial or ethnic groups according to HUD AFFH dataset. Just want to make sure that I'm watching this make sure no one waves me okay cool or any questions like said if you have questions, just type them into the question box and I will respond to them. Be happy to do that. Okay, so now when we look at these indices map, based on Census tract, we see here this is a low poverty Index. And we can kind of we overlaid them on the RCAP/ECAP areas. So, you can really see that they have a higher that low low poverty index, which is basically based on the poverty rate in the Census tract. So we do see we as we would expect to see low low poverty indices where RCAPs/ECAPs are here and here in

Lincoln and here in Omaha, but we see relatively you know, the eastern part of the state and along the I-80 corridor have a high low poverty index, which is good, it's better and then there's some, you know, the more rural swaths of North and the South, kind of a lower low poverty index here. School proficiency index. Again, we see here this is overlaid on the RCAP/ECAP areas and we do see low low poverty school or low school proficiency index in the RCAP/ECAP areas in Omaha. And also, the Lincoln doesn't look as bad to be honest, it's more kind of in the middle, we see here in the yellow for the Omaha region. But statewide, you know, we're looking at statewide, we do see some areas kind of on the western portions of the state with a lower low power, lower school proficiency index, and then kind of some mid high indices. They're kind of up here. So that's an interesting one. And on the kind of the outskirts of the urban area, we do see high school proficiency indexes. Labor market engagement index, pretty much statewide and the more rural everything outside of Omaha and Lincoln looks pretty purple and blue which in this map is good then we kind of dig into Omaha and Lincoln a little bit Omaha has some yellow again where those RCAPs/ECAPs are. So those are some areas that are you know lacking in access to opportunity and also high RCAP areas so concentration of non-white population as well as a higher poverty rate. So those are kind of the disparities and access to opportunity indices coming up through the AFH data set. We need to include that in because we're doing an AI through an AFH framework. So there we go. Disability, like I said most fair housing complaints are based in disability, lack of reasonable accommodation, different terms and conditions relating to rent, those kind of things, service animal type things could be there. We see here the disability rate The State of Nebraska as a whole is 11.5%. Male disability is 11.8% and female disability is 11.1%. We do see here that as you age, the rate of disability is much higher. So, once you get to 75 or older 47.4% of all population 75 or older has a disability. The way you get in this table up here is you have one of these disabilities down here. Hearing, vision, cognitive, ambulatory, self-care, and independent living. We do see here that ambulatory disability has the largest percent share of the total population. So, 5.9% of all persons in the State of Nebraska have an ambulatory disability, followed by independent living difficulty. So, if you look at ambulatory self-care and independent living, you can kind of see why the disability rate increases as you age in living independently becomes difficult as you get older. And so that's kind of why we see an increasing disability rate over as people age, yes, one thing to know a cognitive disability is not necessarily mean mental illness; mental illness is unfortunately not necessarily in this table. And okay, so this is the HMDA the data, Home Mortgage Disclosure Act. So anytime that you buy go, you go to try to buy a house and you go to the bank and you fill out a loan, a mortgage application, they're required by law to track that data. And you know, send it to a government agency. I think it's the I think it's now passing to the Consumer Finance Protection Agency. And then we as made available for detailed analysis. A fun note, if you're a data, the 2018 HMDA data set is way bigger than any, any other previous one just got a whole slew of new, you know, metrics that you can dig into. I haven't had a chance to do it yet. But I'm looking forward to it. Anyway, so this is home mortgage, Home Mortgage Disclosure Act data, but it's only looking at owner occupied single family, you know, houses. So, if you or if you are going to go into a bank to get a loan to buy a house to live in for yourself, that's what this data is looking at. This data also tracks refis. This data also tracks you know, investment, property, housing and that kind of thing. This data is only looking at data for you know, owner occupied home purchase single family loans. We see here over the 2008 to 2018 period; the average denial rates this denial rate is 9.5%. So, 9.5% of all applications were denied over this period. We also break it down by race. And we see here that the white households for white applications who came from what persons were 8.9% compared to American Indian applications 14.5%, African American 15% so, these were much higher, maybe not much higher. They were certainly higher than the jurisdiction average of 9.5%. We see here Hispanic households that were attempting to get a home, home purchase loan or single family house were 15.1%. So, they almost had the highest besides this not available 15.3%. So, we do see some so this would point to some possibility, not necessarily. I wouldn't say discrimination in the home mortgage lending industry. I wouldn't go so far as to say that but maybe some disproportionate

things and we do have tables about why these denial rates, why they're the reason that they were denied, and normally it's credit score and things like that. So sometimes you can get it sometimes you can get these numbers down a little bit if you just offer some homebuyer education courses, you know, strategies to increase your credit score, those kind of things. You know, just strategies to kind of get to bring your credit score up, no might bring these numbers down, actually, so some outreach and education.

Wrong way. All right. So fair housing complaints by basis. So anytime someone does feel like they have been discriminated against based on those protected classes that we saw at the beginning of the presentation, they have the right to file a fair housing complaint to HUD and HUD will track that down. we file a FOIA request to get the data from HUD. So, these are all fair housing complaints filed by basis from 2008 to 2019. I don't I don't think its calendar year, I think this probably goes to September, I'll have to take a look at the exact month the 2019 goes to, but we said let's include it. But like I was saying before, the most common, you know, basis of disability. So, basis means like what your fair house complaint was based on is disability 1,800 complaints were based on disability 1,100 we're based on race. You can have multiple bases. So, you can if you will be an African American disabled, a person was African American and disabled, you can file two, you know, basis. That's why we see total complaints higher, basis higher than total points followed by national origin. So that's normally Hispanic and then see some familiar status. So, you know, the issue so along with the issue you have the sorry along with the basis you have the issue with why was the thing that they were discriminating about. So, we see here that 1,700 of the issues and the largest issue was discrimination in terms conditions, privileges, relating to rental. So, a person with a protected class might have a different contract or different, you know, terms on their lease in a rental housing market than someone with a non-protected class. The second one was discriminated terms, conditions, privileges, services and facilities. So maybe parking or something, a communal pool or something that they couldn't access. And then the third is failure to make reasonable accommodation. And this one is, you know, if you have if you have a disability and you have the means to pay for reasonable accommodation in your unit, and you must return that unit to its original form as you leave, then and if the landlord denies that request, that's a fair housing issue. And there we go. The fourth is discriminatory acts under Section 18 coercion and discriminatory refusal to rent is the last one so they just flat out refused to rent to you if you're protected class. So um, these are the Fair Housing complaints by issues. Now we narrow that down we say okay, so that's those are the issues. That's what and those are the basis these are just the complaints filed, doesn't necessarily mean that they were found to have cause these are just that now these are the Fair Housing complaints found with cause, so they were conciliated or successfully mitigated. They were elected go to court, there's a couple different closure codes that we use to set, select out this table. But basically, there's something happening with your fair housing complaint there was found to have cause so something, something happened. And we see here 198 of all of those complaints were based in disability. So again, those were found to have with cause, follows closely, but are followed by race with 354 and the national origin at 249.

Okay, so those are fair housing complaints and caused by basis now we get into the survey. Let's find it. Okay. So, like said, if you haven't taken the survey, please do if you add thank you. Let's forward it on. Let's get let's get this. Let's just blow it up. It'll be awesome. But we have 160 responses, which to be honest, is actually pretty good. Sometimes fair housing gets lost in the shuffle, especially during a consolidated planning process. You know, we have another survey running. So, take two surveys. You know, it might take some time, but thank you for taking the time to do that. So, we're 160 responses and that will hopefully only go up. We see primary role in the housing market. We have homeowners, local governments and advocates, housing advocates. How familiar are you with threat fair housing laws? You know, not familiar 24, somewhat familiar 58, very familiar 42. So that's actually pretty good. Missing is they didn't feel that way. Now, we have 160 total responses. Please assess the level of fair housing,

outreach and education across the state? And we see here that a too little is 50. And don't know so people don't know if there's any outreach and education and they don't they feel like there's not enough. So, this kind of points to, you know, the additional need for outreach and education. I appreciate you being here on this webinar. Because that is, you know, in a sense, outreach and education. I hope you're learning something about fair housing in Nebraska. Please assess the current level of fair housing testing in the state again, too little 55. So, our Education and testing to see what's going on. Are you aware of any impediments to Fair Housing Choice in these areas? And we sorted them by Yes. So, the rental housing market, people who took the survey, 30 people took the survey, or were aware of impediments to rental housing market. If you haven't taken the survey, yet, there is a comment box so you can type in what those impediments are, and we read that, and we put that in document. The real estate industry was the second one, 23 and the mortgage home and lending industry. Now, we did see some higher denial rates based on you know, race and ethnicity in the HMDA data, so maybe some of the respondents are aware of specific instances where that kind of thing happened. Are you aware of any impediments or various a Fair Housing Choice in the state regarding and then we sorted again by yes, yeah. So, this is sorted by yes, limited access government services, such as lack of transportation and employment services, and I believe that has that might be a like an actual barrier requires a language barrier for so that would kind of fall under national origin. We have some immigrant populations that are cannot access government services or employment services because that's not in their language. That could be a fair housing or fair housing issue, or, you know, leases in their language. Neighborhood or community development policies, land use policies and zoning laws. So, these are kind of all these next three are, you know, laws or policies on the books that may be an impediment or barrier. And again, I hope they, you know, the people who filed that yes to this side of this specific instance or impediment that they were thinking about. That's super helpful. Do you think fair housing solids serve a useful purpose? 102 people said yes. So, there's tremendous buy in on fair housing laws, which is great. So, people think this over useful, useful purpose. They're happy that they're in the state. Are you aware of any educational outreach and education training opportunities? 53 people said yes, 39 people said no and 21 people said don't know. So, there is some people find it useful, and they are aware of educational activities. I mean, you all are on this call. So, I'm assuming you got looked into this through some sort of educational activity or opportunity. Do you think fair housing laws are difficult to understand or follow? Yes. 50 people said yes, no 45 and then don't know 29. So maybe again, this points to some additional outreach and education about fair housing laws and how to or what you can or cannot do. If people have, 45 people have indicated they participate in fair housing training, and you feel thousand laws are adequately enforced in the State of Nebraska. This one, most people don't know they don't know if there's actual outreach or enforcement or testing. Are you aware of any state fair housing ordinance or regulation or plan in Nebraska? No and don't know. So, I'd say, again, maybe some outreach and education about what the State of Nebraska is doing around fair housing. Are you aware of the state's policies and practicing firmly for furthering fair housing? Same sort of what is the top of the one before 34/38? Again, maybe we need to get the word out a little bit more about what's going on with fair housing in the state. Are you are there specific areas in the state that have fair housing problems? Most people said they don't know. But the 18 people that said, yes, I really hope they wrote down those specific areas and I'm sure they did. Because that, you know, if a couple if we get if 18 people or 15 of those 18 people all wrote down in the same area, that's super helpful from an analysis standpoint.

That's why it's important to take the survey. Okay, so I'm going to this is the Fair Housing survey link, but I'm just going to put up this little primer because again, this is a public input webinar. So, if you have any public input, we'd love to hear it. You can type it into the question box up here or in the chat here, and then it will be transcribed automatically or if you'd like to speak, to say you can raise your hand. I think I unmuted everybody. So, you can feel free to talk as well or wave your hand. Now make sure you're

unmuted. Um, let's see. Yes. So um, yeah, so what barriers to people having accessing housing? What groups of people have issues in accessing housing and what can the state do to help eliminate barriers and accessing housing? So, this, we were just acting about any input that you may have on fair housing issues, and here is the survey. I'm just going to leave that one up there. So, you guys can type it in right now. Because I know you're at a computer. Most of them I guess you could call this one in, there's some phones, some phone people here. Okay. And then, you know, if you have any thoughts, you can type them into the survey. So, I'll just kind of stay here for a little bit and answer any questions that pop up on this little question pane or wave your hand and maybe I can make sure to unmute you that kind of thing. Or we can all just have a most beautiful Thursday afternoon. It's totally up to you. Yeah. 117. So, yeah. And then kind of the next just fill you in on the next steps going forward. You know, we compile the survey results, the survey stays open, all the way almost until the final report. So, after the draft report, public review has been published, the survey is open. So are the state stays open. So, we compile this all together. And then we release the Final Report, I believe late February, early March. And then we have one more public input meeting. I hope, I'm pretty sure yeah, one more public input meeting in March. Side note, I will be at the housing, the NIFA housing marketplace. Sorry the NIFA Housing Conference in March. So, I hope you all can join, join us there as well for this and some other things that we do.

Ah question Thank you. How will all the data you have been collected and using the writing, Consolidated Plan and Annual Action Plan for the State of Nebraska? Okay, that's a good question. Thank you, Pamela. So, we are also simultaneously with an AI stuff that we have here we're doing a Consolidated Plan. And a Consolidated plan has, again, its own public input process. We did a Consolidated Plan webinar this morning. And we have another one if you're interested, next Thursday as well. So, join us for that. But the data that we use in the Fair Housing and the Con Plan is slightly different because the Consolidated Plan with just focusing on the non-entitlement areas of the state, so it's minus Bellevue Grand Island likes to Nebraska minus Grand Island, Bellevue, Lincoln and Omaha. So, this data set on the Fair Housing stuff, slightly different than the Consolidated Plan, and Consolidated Plan like I said, it has its own public input process and its own survey. So, you could take both surveys, it'd be awesome. So, I hope that answers your question. We're running a simultaneous public process and data collection process for that as well. And that's all going to be identified so that the Consolidated Plan survey is and public input process is based around, you know, Consolidated Plan, funding needs and things like that identifying housing needs, service needs, economic development needs. So that that that's how we do that this kind of report is part of that process, but it's still slightly out slightly in its own domain, especially since we decided to kind of split the data into two separate scopes. So, hope that answers your question. Man, I like these question boxes. That's great. Okay. Anyone else? Chat question? Raise your hand. No. Okay. Okay, well I will just, I'm going to put my in the chat, I'm going to put my email, if you'd like a copy of the presentation, just please hit me up. And I will send it to you.

There's that. And then also, I hope you take a screenshot of that survey or type it in, bookmark it, so you can send it on. It's also available on the consolidated planning website as well. So that that's all there. And I'm looking forward to seeing everyone in March and, you know, sharing some findings about this and the consolidated planning process. Great. So, next Thursday, we'll be doing it again. So, if you want to hear it again, we might update the survey results by then so that that could be fun if you want to, you know, hear what's going on in real time. Okay. No other questions? I just don't want I don't want to cut anyone off and look, unless they have a question everything. Okay. All right. Well, thank you so much for coming, quote unquote, coming to the Fair Housing webinar State of Nebraska. Like I said, check in next Thursday, we have Consolidated Plan and another one webinar. And if you if you'd like to hear some more, come back for those. Otherwise, we'll see you in March and keep an eye out for the draft reports of both the

Con Plan and the AI Realized near or that around that. So, thank you so much for coming and I hope you have a wonderful weekend. Happy Thursday.

Analysis of Impediments Public Input Meeting Transcript

Presentation

Comment: So, on the Lincoln one there is just a little blurb there?

Presenter: Two little RCAPs and ECAPs. They have to qualify for both conditions.

Presentation

Comment: I don't know where it fits in, but there's language barriers, especially in this part of Nebraska with our high immigration population. I think that's a barrier; I don't necessarily intentional.

Presenter: Yeah. Yeah, I could see that. So like, you know, like, Hispanic or Spanish language application forms, things like that.

Comment: It is more like Arabian and like...

Presenter: Okay. Yeah. So now so that that would fall under the protected class of national origin. So barriers, language barriers. Yeah, thank you. Especially like literature. We did have a Spanish language survey.

Comment: Right, like, we're converting all of our stuff into all different languages.

Presenter: So increase, you know, increasing the amount of languages. Hopefully you lower the barrier, the language barrier. Okay, yeah. Because there is a there's a data topic in the HUD AFH called the place of birth. Place of birth, so we do have that data. So I'm going to take a look at that.

Comment: Okay, I'm just trying to think of what we hear in the community and I don't know that it's necessarily these renters, fair housing for renters and concerns and renters don't know what their rights are. They feel like there's, they complain they get kicked out or their rent gets braised up. I don't know if that fits in with fair housing.

Presenter: Yeah, it's fair housing. It's an interesting thing because I've heard a lot about evictions, you know, like being people being kicked out, and then they're on the street and then they can't get back in to a house because now they're, you know, homeless. And you are right, so that that's the those aren't necessarily a protected class. You know, I've heard a lot of, like criminal history is not it's not a protected class, although it probably should be, you know, that that's the stigma, source of income is not a protected class. But that's, you know, I don't know if it should be is not my place to say but those are things I have heard.

Comment: It almost needs to be exclusionary housing rather than fair housing. That's what I think we're being faced with.

Presenter: So inclusionary, you mean, set aside 20, like a certain percentage of, of a building for affordable housing.

Comment: Right. It was mentioned this morning. And you know, it's not just the homeless, there's all the different levels of rentals that are needed.

Presenter: Yeah, and it and that's, that's where fair housing gets really tricky, because affordable housing isn't necessarily a fair housing issue. But there's a lot of feedback, but between them, you know, I mean, you know, it's, it's not necessarily being not able to live in a penthouse or whatever, it's just being able to afford your rent. And when we talk about disproportionate housing needs, based on race when we see protected classes, several protected classes that have a higher level of housing cost burden. You know, it's a very it's a very complicated issue, you know, because you could decrease, it could decrease that burden by increasing the stock of affordable housing.

Comment: So, times have changed. It used to be they were discriminated against because of your race. You weren't even shown houses in parts of town or you weren't able to get insurance, or the banks wouldn't give you mortgages. Now, it's just all changed. You don't see that as much as the disparities.

Presenter: Yes, I agree. And how to address that is it's very complicated,

Comment: Right and that is what makes it hard when we're doing our grants and doing our fair housing. What are we doing, a lot of this is marketing because it's very hard to identify them. So it's not just based on people complaining anymore.

Nebraska Consolidated Plan Public Input Meeting Transcript

Presentation

I'm the Director of Research at Western Economic Services. We're working on the Nebraska, State Nebraska Consolidated Plan, we've got a little presentation to run through here. If you'd like a copy of that, email me after the presentation, I'll send it on to you. We're also recording this. So, anything that you say, will transcribe it and put it in the back of the document, and then pull out any relevant policy recommendations that may come out of the meeting. If you do have any questions or comments, please just chime in or type them in. All the other boxes also get downloaded to an Excel spreadsheet. So, if you want to be on the record in that manner, please feel free to do that. The chat box also does kind of export as well. So, if you want to be on the record, we will include all of the public input during this session. So that is great. And we'll kind of just dive right in. This works. Okay, I'm gonna just want to see audience view. Cool. There we go. Just make sure you can see what I can see. Alright, so the question why prepare Consolidated Plan? Well in exchange for federal funds from HUD recipients prepare four things. The first is a Consolidated Plan and that kind of identifies the most pressing needs in a community, jurisdiction, state, whenever entitlement is receiving the funds. Number two is the Annual Action Plan. And the Annual Action Plan is kind of the actual projects that are allocated to address those funds identified in the Consolidated Plan. And those actually, that's kind of where you actually spend the money and those are actual real projects. Number three is the CAPER the CAPER is kind of the report card of the Annual Action Plan, which is again based on the Consolidated Plan. So, one, two and three all kind of flow together, identified needs, how to address those needs and the actual money, project, money and projects to address those needs and the CAPER is the evaluation, you make sure you're meeting those goals. And then the fourth is the Assessment of Fair Housing. It's a little bit outside of one, two, and three, but it's still required for entitlement jurisdictions to file. We have a webinar later today at 2:30, Nebraska time for the Analysis of Impediments to Fair Housing Choice. So, if you'd like to come back, we'd love to have you. I just wasn't sure will Yes.

I will either. make them available that yes, the answers. The question was, will the slides in PowerPoint be available afterwards? Yes. We'll either upload it here or just send me an email and I'll send them to

you ASAP right after this meeting. So, the question thing work. Thank you so much. I appreciate that. The purpose of the Consolidated Plan, like I alluded to earlier was help identify housing and community needs, priorities and strategies, and how to indicate how state federal funds will be allocated over the five year period, and your Action Plan sets that actions for your one. So basically, you know, you the exchange for receiving federal funds, they want to know how you're going to spend those funds to best address the needs in your state. How do we go about identifying the needs? Well, first, we start with a massive quantitative and qualitative data poll. Essentially, we pull a lot of data from the United States Census 2010, and American Community Survey, we have Bureau of Labor Statistics data, Bureau Economic Analysis data, US Census building permits data, so a wide variety of data sources that we pull in. That's only part of the story. You know, that's kind of the higher level, the higher level view, you get a more detailed and granular view of what's actually going on in your community by you know, reaching out to the public and actually hearing what people have to say. So, this is a big and important part of this process is the public input. Just making sure everybody can talk if they need to. So, we actually I was in Nebraska last week, we had a Consolidated Planning, public input meeting and Analysis to Impediments to Fair Housing meeting in Lincoln. But it's a statewide AI and statewide Con Plan. So, we were excited that we could do this webinar. So, folks that were not able to come to Lincoln were able to still provide input.

Yes. And also, with the slides will be posted on the page website. Thanks, Rebecca. Cool. So, they will certainly be available. And also, we had discussed on making this, we are recording this. So, the actual recording of the presentation will still be will also be made available in case you want to watch it later, again, it's the world of streaming. So once you kind of get all the quantitative and data input and get all the public input through a public input forums such as these and also we have two surveys running we have a Consolidated Plan survey and Analysis of Impediments to Fair Housing survey, please take them I will say it over and over again. You'll get tired of it. So just do it and then we'll all well what will be good. So, we take the survey results, we take the public input, we take all the data that we find, and then we put it together identified the needs and strategies response. Yes.

Comment: So tomorrow we have our community engagement meeting, which is mainly about tenants and what kind of housing we build. He joined us what, but it'll be at 11.

Presenter: Great. Cool.

Comment: Make sure that the board Yeah, they will be there

Presentation

So okay. Okay. Okay, so content of the five year Consolidated Plan is socio economic context. Like we look at demographic economics and housing trends, housing market analysis, we evaluate a lot of what's going on in the housing market. We use a lot of the CHAS, Comprehensive Housing Affordability Strategy data set for that. That's an important data set. And that's where you kind of dial in on what your current housing need is in regards to affordable housing, housing and homeless needs assessment, there's some Point-in-Time count data, we have a good slew of data there from the University of Nebraska Lincoln, that will be using and then the Housing Community Development Strategic Plan, we put it all together we have goals, objectives and strategies for the Plan. Okay, purpose of today's meeting is to provide you with some preliminary findings, and you know, offer opportunities to comment on what those directions, where those directions are pointing and provide us with your opinions about the needs. Those are important and if you have a solution to those needs, and best how to best address them, that would be great too. And then number 4 introduce the survey. So, like I said, Everything I say here and everything in the presentation will already be in the document. So, it's really what you have to say and your input here that

is, you know, the purpose of today's event. So you have something to say type it in the chat, type it in the questions, that all gets exploited, I will address the questions or just you know, I think you can wave your hand and we will be able to, like, make sure you can you can talk and everything. Okay, sorry, I'm just I'm getting used to this, the webinar thing. Okay, so for the area of analysis with Consolidated Plan, we're focusing on the non-entitlement areas of the state for the, for the Analysis of Impediments to Fair Housing, we're actually focusing statewide so we're preparing two reports in this project. One is the Con Plan, which focuses on Nebraska minus Bellevue, Grand Island, Lincoln and Omaha, the AI will focus on the state as a whole. So, here's that population growth for the State of Nebraska non-entitlement area, we see a pretty good linear growth from 2010 to 2018. You want to see population increasing. So that's a good side. Population increasing increases have their own kind of problems. But those are better problems to have the population decreases. Here's population by race and ethnicity. Let's just take a second to understand what's going on in this table. The 2010 Census is a Census versus the 2017 five year American Community Survey, which is a survey. So that means that there are two separate methodology, so you can't actually compare the raw numbers here. You can't compare the actual population data to the population data. Since the Census is a you know, account of everyone, and a survey is a sample methodology. So, but what you can do when you ever see these two tables, you can see the percentage of total so you can compare those. So here we see the percentage of the white population in 2010 was 91.7%. That actually rose to 93.0% in the most recent 2017 five year ACS. We see here that the other population fell from 3.3 to 1.5. And that's normally because in the 2010 Census whenever we see a big drop in other racial categories, it's because the 2010 Census worded race and ethnicity kind of vaguely; in the Census, you have both the race and ethnicity and the 2010 Census, it was kind of it was worded awkwardly. So, most people who identified Hispanic or non-Hispanic identified as other; in the American Community Survey, that question was actually way more clear as that you have both race and ethnicity. So, most Hispanic persons who identify as Hispanic also now identify as white. So, across the country, we see a decrease in the amount of other percent populations falling from 3.3 to 1.5%. African American populations 1.2, rising to 1.5% and the Hispanic population rose from 7.4 to 8.7%. So once again, whenever you see these tables of the 2010 Census in 2017, five year ACS, you could really focus only on the percentage of totals, if you want to compare the two years, percentage of total verse percent of the total, if you want to just get an actual count, you know, you can see that there's, you know, 1,000,00 million people in Nebraska. So, these numbers are valid, but you just can't compare them to the 2010 Census. White population so the Census is tabulated by a block, which is a city block, which is pretty small. The next level that the Census is tabulated, that is a block group, which is still very small. And the next level up is a Census tract. So, this is a map of Census tract level data. The idea of a Census tract is the population is generally all that is, is generally all the same size. That's why you see in kind of these more rural areas, we see very large Census tracts almost half the size of a county. When you kind of zoom in, you can see here because we have the non-entitlement or the other entitlement jurisdictions have whited out. But again, to Omaha and Lincoln, you see very small Census tracts because there's just a higher density population. We see here and you know, a couple areas of non-white population pops out, right up here. And then over here in the western portion of the state, so but majority on 93.3 to 100% white households across the state. American Indian households, kind of the converse of the white households up here by Sioux City, you see right there Census tract jurisdictions, a 13.2 to 70.3% as well right there, so also some Reservations in there. So, we do see some concentrations of American Indian households throughout the state. Hispanic households, we do see some scattered patches of Hispanic households, here, kind of on the up there, here and down here. Some Census tract levels rising from 40.2 to 88.2% of the population in those Census tracts are Hispanic households. Excuse me. Okay, so that's, that's kind of like the best Demographic trends. There's a lot more tables, trust me, the document will be very, very, very big. I just try to keep the presentation to, you know, an hour or so. So, um, if you do have any questions about demographics, type them in and I'll be happy to answer them. And we'll just kind of keep on keeping on. I just want to make sure again, that everyone

is okay to talk if they want to. Yes, okay. Okay, sorry. Yeah, this thing is a little. Okay, okay. Persons with Disabilities, this disability by age. We see the disability rate in the non-entitlement areas of Nebraska and most recently in 2017 five year ACS data is 11.8% male disability rate is slightly higher 12.4 compared to 11.1% female disability. The thing the takeaway here is that as you age, the amount of the disability rate increases rather dramatically. So, 75 or older, we get up to 46.9% of all persons that are 75 or older are have a disability. And so, you're in this table if you have one of these disability types. Now you can have multiple disability types. That's why we can't have a total down here. And this is the percent of total population with a disability. So, we see here the highest is ambulatory disability 6.6% of all persons in this non entitlement areas of State of Nebraska have an ambulatory disability and the second of two are tied for hearing disability, independent living disability. So, we can kind of see as you age back in this chart, you know it gets harder to get around or self-care or independent living. So, you kind of see that's why you have an increase in disability rate as you age because you kind of fall into these categories. Person with disabilities scattered, there's one area right here. I'm going to dig into that and figure out what's going on. There's probably a Senior Living Center got built there at 22.7 to 29.1% of the population is has a disability. But otherwise, it's pretty, you know, smooth across the state. Okay, so labor force statistics, this is the Bureau of Labor Force statistics annual unemployment rate. This is the state of the non-entitlement area of Nebraska. So, we selected out the entitlement cities, and we see here trends pretty similar to the statewide rate as a whole, slightly less than the most recent numbers. Now this chart looks good. I mean, you know, we had a bump here in the early 2000s. And a big bump. Well, actually, it looks big here. If you look at the you know, Y access we're only peaking at about like, 4.6%. US was well over 10, I've seen jurisdictions at 16%. So, you know, the chart looks like it took a big, big hike, and it did, but you know, comparatively across a pic comparatively to the rest of the country, the state of Nebraska really weathered the Great Recession extremely well peaking at, you know, a relatively modest 4.7% unemployment rate. But then we see, you know, a continual decrease in unemployment rate after the Great Recession in the post-recession recovery. Now, anytime you see this chart, you always want to ask, Well, what does the actual labor force and unemployment look like? Because you can have a decreasing unemployment rate with decreasing labor force and employment. So, this is the chart here we have employment is the yellow line. Blue is the labor force. So, we do see here that you know, during the Great Recession, we see a dip both in employment and labor force, employment fell faster than labor force right here. The difference the area between the two lines is the actual number of unemployed persons. So, we see here the unemployment rate took a larger dip in the labor force, which is why we see a spike in the unemployment rate. But then, you know, we do see an increase in the employment and labor force during the post-recession recovery that we see here. And that's kind of driving this unemployment rate down. But then we do see some stagnation and slight decrease in the employment and labor force and the non-entitlement areas of the state. So, although the unemployment rate is decreasing, we do see also decrease in the labor force and employment. So, something to keep an eye on, it's not like a massive decrease. It's just kind of stagnating and trending downward. So, it's not necessarily something to be extremely worried about. It's just something to track. It's still much higher than, you know, the 2000 levels. So, in post-recession, so if you look, it's over there. So just something to keep an eye on. Here we go. And this is the actual chart that we saw, you know, unemployment rate spiked. 4.7 and 2.9. And then down to 2.7% classical economic theory says 4% unemployment rate is full employment. That that's what they teach in textbooks back in college. I'm not sure if that's necessarily true anymore because the economy is so different now. But we see Nebraska is well below that 4% rate and even during the Great Recession was just slightly higher than that. So, the labor, you know, despite the, you know, the stagnation and maybe some jitters in the labor force and employment growth, we do see a solid economic outlook in Nebraska. You know, generally. Real average earnings per job is from the Bureau of Economic Analysis, the Bureau of Economic Analysis is only available at the county level. So, we were unable to subtract out the entitlement jurisdictions and this is the statewide stuff, so we always swap that. But we do see here, you

know, and so, this is real average earnings per job. Anytime that you work a job and you earn money; the Bureau of Economic Analysis tabulates that, and they sum up all of the earnings across the entire state and divided by the number of jobs. So, we get average earnings per job. If you work two jobs, if you have two part time jobs, those jobs are divided by, you know, those are added twice. So, you can, you can actually be in this twice, divided twice. So, we do see a pretty good increase. And actually, you know, during the, during the, you know, 2009 if you think during the post-recession recovery, we see a pretty sizable increase in the average earnings per job. But then again, we see a kind of stagnation and decrease. And that kind of mirrors what we what we're seeing here up in this kind of decrease employment and labor force. So, it's kind of again stagnating and maybe dropping off slightly. Not dramatically, but something that was just keep an eye on households by income. So, we also see this the 2010, five year ACS and 2017. We see here the main takeaway of this slide increases in \$100,000 or more percent of total rising from 16.1 to 23.5%. These are undefeated dollars. So, we do see the dollars on this side, the 2017 dollars are worth less than the 2010 dollars, just because of a, you know, inflation and the lack of deflating these values. So that does account for some increase in the household, you know, and the higher end of the spectrum, but not that much like the cost of living increases aren't that that much. But then we also do see decreases in less than 15,000 households falling from 11.4 to 9.1%. And, you know, kind of the middle of the spectrum as well 25 to 35, 11.4 to 9.8. So, we do see some increasing in household income, kind of on that next topic, poverty by age for the non-entitlement area. The 2010 Census, like said does not ask about income, and then they change the poverty questions in the American Community Survey. Like midway way through, so you couldn't actually get a 2010 poverty estimate. So, the best we can do for a temporal comparison between these two for the non-entitlement area is 2000 Census in the 2017, five year ACS. And we see here that, you know, there was a very small increase in the poverty rate 9% to 9.7%, I've seen much, much worse throughout my travels. So that's actually a pretty good you know, pretty good number, poverty rate by Census tract statewide. We do see some concentrations of poverty here. If you remember back to the demographic slides, those are the Census tracts where we saw higher concentrations of American Indian households. And then everything else is pretty much smooth across the state. Some other ones here, kind of in the zoom, you zoom into these jurisdictions, you can kind of see there as well. Some higher concentrations of poverty, but nothing over really, you know, that jurisdiction average was 9.7%. So, nothing, super outrageous, up to 24.8 to 32.7% in these upper Census tracts. Sorry, it's like it's still early here. So, I'm drinking coffee. Economics, poverty rates; this is the small area income poverty estimates. This is another way of measuring poverty also put up by the Census as available statewide and county level. So, we're unable to subtract out the tunnel jurisdictions. That's why the State of Nebraska, but we do see here a poverty rates increasing during Great Recession. That makes sense. You know, we saw a spike in the unemployment rate people losing their jobs, poverty rate increased, and then you know, kind of mirroring the recovery, we see a decrease in the poverty rates. So, we see decrease, also a decrease in labor for excuse me, the unemployment rates. So, we see some decrease in poverty rates. Homelessness balance and time, Point-in-Time counts, continuum of care. When I was out there last week, I was told that this chart the 2012 stuff was invalid. So that will go away. And I'll probably get that, get that out of here for next Thursday's presentation and then we see so just kind of ignore the 2012 stuff it had different methodology. Quick note on this methodology This is about this is a point in time count. So, it happens early January, once a year, you go out and count all the persons that are experiencing homelessness. That's a difficult project because there are, you know, those folks are often moving. And it's hard to keep track and you don't want to double count and it's hard to find, find them sometimes. So there the HUDs idea of doing it in January, it's cold, it's very cold. So, their idea was that you could go to a shelter if you know if you were experiencing homelessness, and it was cold, you would go to a shelter otherwise you might be more transient in nature and then you get a more accurate count. I don't know if that actually works in practice because you know, when it's super cold, you might just go you try anything you can to get off the street. So, I believe the isn't it are actually under

representative of what's happening. Again, please disregard the 2012 it's a different methodology. But we do see here you know decreasing, decreasing, the persons experiencing homelessness are kind of decreasing and trending downward in 2018 was a little higher, 2019 is a little less. So those are those are kind of moving in the right direction. Emergency shelter is kind of also, so the black bars is emergency, transitional in gray and unsheltered is the blue. So, we do see a kind of increase in 2016, 17, 18 and then falling a bit in 2019. This is household so this is persons, and this is households. They mirror each other pretty well. But again, ignore 2012 we're taking that out as for as per our suggestion last year or last session. Okay, so housing units by tenure. The way you read this table again, it's kind of a nested table here. So total housing units or is just like a unit to live in, it's a house, it's an apartment unit, duplex, triplex, boat, RV, they count those. And then so those are just physical structures where people can live. Once that is occupied when someone moves in and becomes an occupied housing unit or household, same thing, and then you are either renting it or owning it. So, it's an owner/ renter. So, the way you read this is total occupied plus vacant equals total housing units and owner plus renter equals occupied housing units. So, we do see here a slight decrease in the percentage share of owner occupied households falling from 73.1 to 72.4. And then conversely, a slight increase in the renter occupied share rise 26.9 to 27.6%. Those are big increases and owner occupied share at 72.4% is pretty high compared to the nation at national average. So that's pretty good. We do see a slight increase in the vacant housing units rising 10.9 to 11.3%. Now when we dial in, now we can like kind of zoom in on just the vacant households. These are households with no, you know, with nobody living in them. The disposition of vacant households we see the majority are the majority are for seasonal recreation, not the majority. 28% of them are for seasonal recreational, occupational use, for rent, for sale, rented sold on occupied sold, not occupied don't really need to worry about them, they're still in the market, they're just taking a little bit of time to be absorbed back into the market. For seasonal recreation or occasionally you don't need to worry about those either because they have a purpose. They're just they were just vacant at the time that someone received the survey, which you do need to kind of worry about or zoom in on this other vacant household. That's just by little definition, the Census definition is none of the above. So, it's kind of like choose your own adventure. But what falls in there foreclosures, are closed households, household dilapidated households that the owners just kind of just letting sit there kind of ready to fall apart, but they don't have the, you know, the resources or, you know, immediate desire to take those houses down. So that's kind of basically anything not in the above. Unfortunately, there's not a better definition than that. And so, here's the other vacant households, just four of all vacant households. This is not of all households. This is just zooming in on how vacant households, what does that look like? And we do see some pockets of like high, you know, other vacant household scattered throughout the state. In some jurisdictions, like to look at this data and see if they can somehow bring those units back into the marketplace. Your kind of really have to kind of dig into what's going on there. But this is kind of just a high level overview about where those are issued across the state. Yeah, so. Okay, so continuing the housing market, we see households by year built, majority of the housing stock in Nebraska, non-entitlement areas in Nebraska was built in 1939 or earlier 23.3%. And then we see another kind of building boom in the 70s, 16%. And then we see another kind of more recent one in the 1990s and 2009, 10.5, and 14.6%. So, we do see a kind of a stratification of rental or rental, just housing stock 1939, the 70s, and then kind of the 90s, and more recent stuff. So those are kind of the peaks, if you will. Anytime that you want to build a new house, you file a permit with the local jurisdiction that you're built, where you're building it, and the Census data collects that the Census collects that data and makes it available for analysis. These are single family building permits from the United States Census, the blue line or the blue bars are the permits. The yellow line is the actual value that you write down on the permit. Now that value does not include cost of land, that's just, you know, cost labor materials building and those kind of things. So that that this number over here is, you know, does not include cost of land. But what we do see here, you know, we see a kind of a big, you know, big build up, like we saw on the previous slide. Here, we seen the 90s, in the 2000s, we see

some, you know, bigger share of housing stock, and we see that here we see it in 1990, some good building, and then we see in the early 2000s, you know, this is, you know, indicative of the housing bubble, we see a big increase in number of single family number of units built, and then you know, after the housing market burst, we see a decrease in the number. So, falling down all the way to 2011 was kind of the, the minimum and then we see you know, increase in kind of this new structural normal rate here, you know, kind of around 2,500 units, we see good the building permits fluctuating above 2,500 This looks like to be at least in the most, you know, for the remainder of this of this dataset, kind of like the new structural normal and if you trace it back, it's below the 1990s but above the 1980s. And then but the to the 2000s was a very weird year for housing, obviously, because hopefully you're once in a lifetime or once in the yeah, once in a country time event. But during the collapse of the actual number of units built, we still see an increase in the value of those units being built. And this is kind of where you start seeing the beginning of these the affordability housing issues, because you see a decrease in supply, but the value is still going up. So, you know, in the market supply and demand economics 101. If you decrease supply, as a result, price will increase. And then you're also increasing the value so it's kind of like a double whammy. That's why you been seeing some housing stability issues throughout the state and the country. You know and then it just hasn't been catching up there. The building permits also evaluate not only single family units what we just saw but all you know unit types duplex, triplex, apartment units. So, we see here the gray is the single family. The black is apartment units, kind of yellow is duplex and blue is the triplex. So we do see here that we have some decent multifamily units being built. And again, this is for the non-entitlement areas of the state in the 90s. And then kind of falling off in the most in the early 2000s. During the actual you know, crash the when the bubble was bursting, not a lot of multifamily units, but then we see a couple 2010 and 2013 standout years big units. These are units so if you have one apartment complex with like, you know, 100 units, this is the unit count, not just the complex count, and then we kind of see here a mix there. So that's what we see, that's a total bill total permits by unit type the non-entitlement areas of Nebraska. This is median contract rent from the 2017, five year ICS. We see higher rents around more urban areas, that's to be expected. We blocked out like I said, the entitlement areas but we do see surrounding Omaha and Lincoln higher rent and also in the I-80 corridor a little bit and some pockets throughout the state. Median home value also kind of follows the same trend, but the you know, the expansion is a little bit bigger around the urban areas we see here urban areas, higher median values, again, around at higher values here and again, so the western part of the state. So those are meeting home values and meeting contract rent from the 2017 five year American Community Survey. Okay, now we're getting into housing problems. This data set up here's the CHAS data set, Comprehensive Housing Affordability Strategy data set. This is created by HUD specifically for the consolidated planning process. So, they really want to see this tables, these tables. And C is for comprehensive. There's a lot of tables we include a lot in the actual document. We only included some here in the presentation. So, because you don't want to hear me talk all day. But first things first, the house the definition of a housing problem is something defined by HUD, you have a housing problem if you are suffering from one of four conditions. The first being you're living in a housing with lacking complete kitchen facilities, like you don't have a refrigerator, you have a housing problem. The second is lacking complete plumbing facilities. Like you don't have a sink in your bathroom or haven't been a toilet in your bathroom. You have a housing problem. I guess you use a bucket. The third is overcrowding. If you have more than one persons per room in your dwelling unit, you're overcrowded; have you more than 1.5 persons per room, you're severely overcrowded. So, overcrowding and severely overcrowded come together. If you're overcrowded, you have a housing problem. The fourth most common and unfortunately, the most serious is a cost burden be spent above 30% of your income on housing costs, your cost burden, if you spend about 50% of your income on housing costs, you're severely cost burdened. And when you're up above that 50%, you may be a couple paychecks away from being in a very tricky situation where you may be experiencing homelessness in the future, or near future. So, we dial in on the severe cost burden because that's, you

know, a very great need and then cost burden but if you have a cost burden above 30 to 50, is cost burden. 50 and above is severe costs burden. So anywhere in that range above 30 you have a housing problem that accounts for around 75% of all housing problems; lacking complete kitchen or plumbing facilities around 2 or 3%; and overcrowding is in the middle of the remainder. The status that, you know, tabulates not only by housing problems, but by income levels, and also by a variety of, you know, household characteristics. In this case, this table 1, this is non-Hispanic, non-Hispanic by race by housing problems. So, we were able to see here throughout the non-entitlement areas of the State of Nebraska, 21.9% of households are experiencing a housing problem. That's actually pretty low compared to the nation and other areas I've seen. But when you break it down by race, we do see that the American Indian households, 40.5% of the American Indian households are experiencing a housing problem that's almost double jurisdiction average. So, we would see we would say that they would, that the American Indian population is experiencing disproportionate housing problems. African American households also at 37.3% higher than the jurisdiction average and then Hispanic of any race 32.9%. So, we do see some kind of peaks among racial breakdowns. So that is the percentage of total are these are the percents and these are the actual just numbers so you can actually see, so we do see although, you know only, not only about a fifth of all white households are experiencing a housing problems, the majority of those households in the non-entitlement area in the state are facing that are facing housing problem are white households with 79,000 white households facing a housing problem, African American 1,600, American Indian 1,186, and then Hispanics, 7,650 for a total of about 91,491 households, or like I said, 21.9% of all households in the state are experiencing a housing problem. So, this is kind of where you start with, you know, when you're looking at affordability. No cost burden, cost burden, severe cost burden, not computed is if you don't have any income, so you can't multiply, you know, point three by zero, math doesn't like that well, it gives you zero. So, you know, it's not computed. But we see here that and then this is broken down by owner tenure share. So, owner renter by race, severe cost burden, we'll just kind of look at this owner occupied 17,000 owner occupied households throughout this non entitlement area, the state are experiencing a severe cost burden that's spending above 50% of their income on housing costs. Renter occupied households are 16,133, for a total of 33,206 households are experiencing a severe cost burden throughout the state. And then your kind of so that's, that's above 50%, and the cost burden is 30 to 50. So that's still considered a you know, a housing problem and we see an additional 31,000 owner occupied and 19,000 renter occupied, so the total you need is something around, you know, at 83,000 units are experiencing a housing problem, cost burden or severe cost burden. So, these are, you know, good numbers to start with. This is just if you are experiencing a housing problem, one of those four, where do you know, are there any concentrated areas, we don't necessarily see any, throughout, there are kind of one or two areas down here. Sometimes, you know, on a statewide map, it's kind of hard to see the more urban Census tract areas. So, there are some areas, some concentrated areas of Census tract, but then we can break it down by racial characteristics. Here's Hispanic households by housing problems. And we see here that if you are a Hispanic household and some of these areas, there are, you know, you, you're more than, you know, 75.9% to 100% of Hispanic households in these areas are experiencing a housing problem, according to HUD, and then we also see American Indian households again, scattered, gray is does not exist. Something, you know, over here where we saw a larger concentration of American Indian households, we don't necessarily see a large concentration of housing problems, but then kind of scattered throughout the state, state could also be small sample size, but this is what the data is showing us. Okay. Cool. So, what are we doing? We're just going to show you to talk about some brief program descriptions. I'm going to show you some preliminary survey results and, you know, hopefully, we'll get some public input either on the chat box or the talking or the questions, whatever. It's the future so we can do it all. And then we'll have another public review meeting here in I believe in March, I just booked my trip. So, I think I hope we're on for that. Okay. So, there's a couple programs that that you know, are using this data to get you know, using the data for the Consolidated Plan. First one is Community

Development Block Grant. So, this program focuses on activities involving rent rehabilitation and residential nonresidential structures, infrastructure improvements, public service, such as job and economic development, assistance providing for local governments for public private for profit, nonprofit organizations. This one is kind of the broadest, you know, has the least restrictions, you can do more of it than the other ones. Families benefiting from the program must have incomes of no more than 80% of adjusted median family income for the area. So that's why it's important to have these tables as you can see, the income is breakdown, this is actually zero to 30, 30 to 50, 50 to 80. So, you know, focusing on households with under \$62,000. And the objectives the national objectives for the CDBG funds are a benefit low and moderate income persons, prevention of elimination of slums or blight and addressing the most urgent needs identified in the Consolidated Plan. Home Investment Partnerships, this program upon a wide range of activities including building, buying and or rehabilitating affordable housing for rent or homeownership, providing direct rental assistance to low income people. Families benefiting from this program must have incomes of no more than 80% HUD adjusted median family income, lower income targeting for specific activities and home funded housing units must remain affordable in the long term. And that's 20 years from new construction of rental housing or five to 15 years for construction, homeownership housing and housing rehabilitation. Now, National Housing Trust Fund is an affordable housing production program that complements existing federal state local efforts to increase the preserve the supply of decent, affordable housing. Families benefiting from this program must have incomes of no more than 30% of HUD adjusted median family income. So, and then FTP funded houses must remain affordable for 30 years. So, if you go back to the CHAS data set, we're looking at a households with a rate less than around \$23,000 per year. ESG funds emergency solutions grants up for this program provides funding for the three outreach emergency shelters homelessness prevention and rapid rehousing assistance. This funding is paired with state funding from Nebraska Homeless Association Trust Fund to create the Nebraska Homeless Assistance Program and HOPWA, Housing Opportunities for Persons with AIDS. This program is dedicated to housing needs of people living with HIV AIDS and funds can be used towards housing, new construction, rehabilitation, rental assistance, short term payments to prevent homelessness. Low Income persons at or below the 80% of area median family income that are medically diagnosed with HIV AIDS and their families are eligible to participate in this program. Okay, so as a 1/29/2020, there were 444 online responses to the State of Nebraska Housing Community Development survey. If you haven't taken it, please do. If you have, thank you, pass it on to your friends, your families, your enemies, your professional network, anyone, the more responses that we have the better this is kind of how we identify, you know, perceived need, we can quantify this and, you know, then, you know, we can show it to hide be like this is what the community responded to. So, please take the survey if you have again, thank you haven't come on, let's do it. So, we sorted this and also the survey was designed, you know, with the Consolidated Plan, funding requirements and funding, you know, Feasibility in mind so we asked, you know, questions that you know, could be addressed by those programs that we just talked about. Here this is sorted by no, low, medium, and high need, construction new affordable single family homes for sale, construction of new affordable single family homes for rent, and construction of new affordable multifamily homes for rent. So, we see construction of construction of new affordable units are the highest perceived needs as of the most recent survey. We see 222 to 179. So, and then kind of slightly under that are homeowner housing rehabilitation and first time homebuyer assistance. A lot of the time sometimes not all the times, it's actually cheaper or rather cost relatively the same amount of money to actually own your house instead of rent. Owning your house has a lot of other long term benefits and, but a lot of people just don't know how to transition from a renter or into a homeowner, especially if they don't have kind of that that, you know, knowledge built into their long term, they don't know. So, it's good to have a homeowner first time homebuyer assistance and rental housing for very low income households falling. Do any of the following act as barriers to development and preservation of affordable housing and community? So, the first slide clearly shows that there is a need a perceived need for

affordable single family and multifamily homes for rent and sale. Well what are the various bringing this to the market and cost of land cost, the labor and cost of materials? The cost is the highest barrier, which you know building affordable housing you want to make it affordable. However, bringing it to the market is difficult based on the cost factors. Forth, kind of low with the Not In My Backyard Mentality, NIMBYism when people hear affordable housing. We do sometimes have a stigma attached to that word, which is unfortunate, doesn't necessarily mean what you think it means. It could mean housing for teachers, it could mean housing for police officers, firefighters, someone just living in your community that doesn't want to commute so far away. So, I'm just combating the NIMBYism aspect is a barrier. And I do see a question here about being able to send me a link to the survey the survey. Oh yes, we have a link to the survey here. I will find it there will be a link to the survey. So yes, I will make that link available and I believe it's also on the Consolidated Planning page as well. Retention of existing businesses, so business and economic development activities in Nebraska retention of existing businesses, so if you have businesses keep them that's the big one. We did see in that economic slide the both labor force and employment stagnating and kind of falling off a little bit, so we want to stop that and turn that around. Attraction new businesses, so keep the ones you have bringing some more, and labor availability keep your labor, human capital in the state, and kind of increase that human capital. Wait, went backwards. There we go. So this infrastructure activities, street and road improvements were diagnosed with the highest need 171, broadband and internet services at 155. You know, getting high speed internet is kind of a gateway to the new economy. Sidewalk improvements 124. We do. Some flood drainage improvements, the next the fourth one at 122 of my biking and walking paths at 114. Community and public facilities in Nebraska, childcare facilities 177 and demolition of dilapidated structures second highest at 153. And I'm wondering if that kind of correlates to that high other housing vacant unit that we saw in that first slide. But there's clearly a perceived need for demolition of dilapidated structures that are no longer on the market or able for rehabilitation. And third is youth centers and then the one kind of same one who's tied 112 community centers, human and public services in Nebraska, mental health care services were 198, child care services at 179 and chemical dependency services at 161. So, we do see some needs for human public services in Nebraska, mental health and chemical dependency, not necessarily correlated but there is certainly some feedback between the two and childcare services. Please rate the need for housing a types of special needs population in the State. Senior housing such as assisted living facilities. You know, the baby boomer generation is aging, rapid rehab housing for rental assistance for homeless households, and transitional housing. So, we do see some needs for seniors and those homelessness are about to experiencing homelessness. Please rate the need for services and facilities for the special needs groups in Nebraska, at risk youth, aging out of the foster system, the highest perceived need persons with severe mental illness and the elderly. So again, that kind of are the age 85 plus so we do kind of see that kind of correspond with this housing slide there. So this question is, if you were in charge of distribution of funds in the state, so let's say like if I gave you \$100, how would you spend that hundred dollars on this on these categories, the highest 21% or \$21, more spent on housing development, followed by economic development and human and public services at 15%. And we do kind of see here water infrastructure, public facilities and planning kind of down the line. Okay, I need to find that survey link for you. So, what are the needs of the community? What challenges are the households facing and what can the community do to address these challenges? So, you can either ask me a question here on the questions tab, or you can talk I'm going to just make sure everyone is unmuted. If you guys want to if anyone wants to wave their hand? Maybe I can unmute your something.

Consolidated Plan Public Input Meeting Transcript

Presentation

Comment: How are those two different?

Presenter: Well, yeah, so independent living. So if you know if you can't walk, or if you have a hard time getting around, but you can still take care of yourself, like you you're in an accessible unit, or something like that, that, you know, you would identify as independent living. These are also since it's a community or it's a survey or they're also self-identified. So it's like the survey, you know, you do your best that you can with survey stuff. So some, you know, one person would consider themselves both ambulatory and independent living difficulty, whereas someone else might just consider themselves having an ambulatory disability feel like I can, I can still live without an independent living disability.

Comment: So would the self-care disability be where they have to have somebody come in?

Presenter: Yes, yeah.

Presentation

Comment: I would recommend that you remove the 2012 count. That was conducted under a different not only methodology, but a different organization was conducting that, and it is not valid.

Presenter: Okay, great. Thank you for coming. Yes.

Comment: there is no way that the State of Nebraska had 600 unsheltered homeless in one night.

Presenter: Yeah, that's, that's why I'm here. Thank you so much. And also that that points to, you know, what I was trying to get at is, you know, different years can have different methodologies. So it's kind of hard to track everything, but these do look, these do look, you know, the more or less the same, but so yeah, we will take out 2012. Thank you.

Presentation

Comment: They might have been flooded out.

Presenter: They could have been flooded out and just kind of Yes, exactly. Yeah, it does. It does certainly follow.

Comment: How do they get this data?

Presenter: I know that's right. I'm glad someone asked this. So they work with the United States Postal Service, then, you know, because they know if they send out the letter, the US, the US Postal Service has like a vacancy database of vacant housing units. So they work with them to get that.

Comment: So if I have a housing unit that I rent, but I don't like to advertise that I rent it. I like to handpick my tenants.

I'm probably going to show up as other vacant, right?

Presenter: If you get the form, and that's what you check. Yes.

Comment: Well, you said the Postal Service though.

Presenter: Oh for vacant it well, yes.

Comment; they probably just don't know there is nobody there.

Presenter: Yeah, they don't know. So Exactly. So that's why I really was hoping that there'd be a nice definition in the actual documentation, but there's nothing so.

Comment: So if it is vacant and dilapidated and no longer the postal service it is not in here?

Presenter: That would be I mean; the Postal Service knows. Oh, if it's completely gone.

Comment: Yeah, there's no windows.

Presenter: Yeah, it's just sitting there. That would probably be there. Yes. It would probably not be covered in the survey.

Presentation

Overview of Programs

Comment: The NHAP program trust fund this year in the State of Nebraska took in over \$1.7 million cut from its previous funding that is going to impact our homeless service system. It is going to be impacted negatively. It doesn't look like anything we can do about it. But that is a substantial cut in the emergency shelter, outreach and prevention homeless assistance program and that was across the entire state.

Presenter: Okay. Thank you said. Yeah, absolutely.

Presentation

Comment: I can't remember on the survey. Were those listed?

Presenter: Yeah, it was all it was all listed and then you like so it was all listed and then you had to rate the need, you know, low, medium, or high, you kind of just click the button, or each one of these.

Presentation

Comment: The conversation about workforce housing. I'm somewhat surprised to see the market rate housing for single family for sale, for rent, mixed income, all of that is far down the list and others workforce stuff, but just looking at what's happening in conversation in the state, yes, I will expect it to have seen those on the list, I do think this is probably more representative of where our needs are at. So just comment, that looks like the respondents are in line with what we need for construction on affordable housing.

Presenter: Yes, yes. Yes, good point.

Comment: Also, I don't know, previous years, but it seems that there is more of a balance in answers between actually single family, multi family, rents. It's actually more than the for sale.

Presenter: Yes, yes, absolutely good points.

Presentation

Comment: And community centers tied with the youth centers.

Presenter: Yes. Yeah, they're very similar.

Presentation

Comment: I guess I'll just follow up on his comments. Regarding the Nebraska Homeless Assistance Program and the Homeless Shelter Systems Trust Fund and hopefully I can articulate this is and help to the documentary stamp tax. So we have in Nebraska, we have the real estate transfer tax when a person that person purchases the home; it's \$2.25 cents for every thousand dollars of assessed value. And that's broken up into different categories. Our Nebraska Affordable Housing Trust Fund, the Homeless Shelter Systems Trust Fund, and the Behavioral Health Services Fund and I know there's other funds. The, I used to manage part of that Behavioral Health Service Fund for Region Five Systems and every year, it's based on home sales. So, every year that funding would go up in the Division of Behavioral Health and would allocate additional dollars to the Regional Behavioral Health Authorities throughout the Nebraska. But that the point is that that funding would increase as home sales would do well. So offered opportunities for better health providers and that scattered site rental assistance. Thousands of people with serious mental illnesses are housed. It's an incredible program that's unique to Nebraska and it provides housing discharge plan for people coming out of state institutions. So I would, I would assume that the Homeless Shelter Assistance Trust Fund would also see increases. And I think that there's a need for, we are luckily in Nebraska, we do have a new position at the State of Nebraska through the Division of Behavioral Health. Its job is to link the siloed HHS Departments, so we have public health, which manages the HOPWA, Housing Opportunities for Persons with AIDS. We have the Behavioral Health which does that behavioral health funding and then we have the Children and Family Services Division, which manages that Homeless Shelter System Fund and HAP. And this new position, then we'll hopefully link those and I'm wondering if they can learn from each other, streamline their efforts. We have an incredible coordinated entry system in Nebraska now that closed side door agencies and created one front door where agencies come together use a similar, the same assessment tool to identify homeless folks. And they, as a community decide who is most vulnerable and who needs that housing. And so, instead of this agency deciding to house this person and that one, now it's streamlined, and we all provide housing. The person really who's most likely to die on the streets, we get them housed first, then the community makes that decision. I wonder if there's a way that the community can help streamline These different homeless, special need population funding sources. So, having said that, that's where the surprise comes in and maybe there was a drop in this funding, because it would appear that home sales are increasing. I just think there's an opportunity where those programs maybe should mirror each other. Why is one increasing where the other ones decreasing? Just for record, I don't know.

Comment: I didn't even know it was decreasing.

Comment: So, it was the state funding that decreased?

Comment: Yes.

Comment: Just to follow up on that the Department is having open door meetings about the cause on why the funding has decreased. It is more complicated than just what we have here, but nonetheless, that funding that we're operating at as a homeless service system is, is decreasing. It's almost 37% of the total funding. And to do that to an emergency crisis system like that is devastating. So I think what he is suggesting, with collaboration across the systems, more communication about upcoming changes would have been incredibly beneficial for the emergency system to know to start planning, because now we've got basically from now until April to plan how we're going to manage these cuts across and that's significant. So your numbers on the Point-in-Time I would predict it increasing.

Comment: You know, that will tie into the federal funds that we then receive from our numbers and our appropriations of those statements will also be affected. So, it has a very large ripple effect on the entire state and into other state systems.

Comment: I would, even if that weren't such a pressing issue right now. I think what we need to keep in mind when we look at these federal programs, this there is a tendency in administering them to lean towards what is what some communities will often say that one homeowner they anchor the community, they build wealth, all of those things are positive. But if you have a system that does have the resources became housing rental assistance and they can't find units. We still have something that we have to address. So we need to make sure we can keep in mind that those rental units are needed in these communities, I'm not saying whether they need to be new construction or preservation of what we have or rehab or all of the above. But in allocating resources, we need to take a look at that. It's more difficult to finance rental housing, because it's not based on you know, I've got this value this house and mortgage on it. And so I think we also tend to lean towards the homebuyer, because you tend to get more units and assistance, those kinds of things. But even in the even in these preliminary results of the survey, so there's some recognition that there needs to be probably rentals at all kinds of income levels. People may eventually buy a house, all of those kinds of things. Every year we fall further and further behind in that in that scenario, our best tool is Low Income Housing Tax Credit, however, it is one sector of the population that we're addressing with that and there are rental housing needs to go higher and even sometimes to lower incomes.

Presenter: Perfect. Thank you. Yeah, we do see that the survey. So that's good. That's why I'd like to see, you know, things come together.

Public Hearing for the Consolidated Plan, Analysis to Impediments of Fair Housing Choice, AAP and CPP Transcript

4/14/2020 1st Meeting

Comment: What resources could help non entitlement communities tear down basic making housing stock for disrepair?

Presenter: That's a really good question. Thank you, Yeah, we just see a high need for vacant housing units. A high need to tear down dilapidated housing stock. Let's see if there's a, So there should be and it could fall into downtown revitalization, Public Works. So yes, that's a good question. I'd have to figure out the exact program or how you'd apply to that. But hopefully that will be addressed, but hopefully there are some ways to do that because it did it did, you know, pull out in the yeah. In the in the excuse me in the community infrastructure, economic development. So yes, that's a good question. Hopefully, hopefully, we'll be able to answer if I can't. So the other thing if I can't answer the questions now, we will answer them for the final public or Final Report.

Comment: How do these numbers affect your decisions about minimum grant application amounts? We have many communities who have very small budgets and would like to apply but can't meet the match with such high minimum app amount requirements.

Presenter: Also a very good question. On the program side. Let's see here. That is a good question. And that would have to be hand handled someone internally there that that deals with that. Yes, Rebecca. Steve in Charleston. I got you, Steve. Let me see if I can find See, Steve should be able to answer that one. There we go.

Comment: Can you hear me?

Presenter: Yeah, I can hear you.

Comment: What was the question again?

Presenter: I believe it's out of the numbers affect your to see around minimum grant application amounts, we have many communities who have very small budgets and would like to apply but can't meet the match with such high minimum application requirements.

Comment: That's a good question that's come up before in the past. I would encourage those to submit those comments. And one of the reasons we set a minimum is because we have a expenditure rate that's reviewed by HUD, and they keep track of the amount of funds on balance in the US Treasury. And so the number of grants we have to manage is very large when the amounts are very small, as we move forward, so we've determined that there is a an amount to work from as a as an operating base. So we set some minimums that aren't what I consider to be large and we've also said some maximum which, we've increased the amount of funds that a local government can apply for. So it's driven by the fact that we have HUD looking at how we expand our funds quickly and it's also based upon the number of projects the states has to manage, and take care of as the grant administrator each year and over the multiple years.

Presenter: Cool. Well, thank you for that clarification. I hope that answers your question. But it is now you know, that question is recorded, so we'll certainly add that in the final. Cal Grimes I tried to unmute you because I see your hand up but I can't unmute you. You have to dial a pin or whatever. Yeah. who would I who would address the resources for entitlement communities that could tear down vacant housing

stock that is in disrepair? Do you have someone that would be able to adjust that. Let's see if we can get an answer. Or if anyone has additional questions, keep them rolling in. So just to kind of circle back to Elizabeth question of what resources could help my community tear down vacant housing stock to tear down structures and NAHTF funds could be used with another activity would need to be combined with it. So thank you, Rebecca, for helping me out there.

4/14/2020 2nd Meeting

No comments

Appendix 2.1 | CDBG Administration Manual, Program Income

Program income for the CDBG program is regulated by the provisions of 24 CFR 570.489(e). This regulation should be consulted for definitions and for other guidance concerning program income.

Broadly, program income is defined as gross income received by a State, a unit of general local government, or a subgrantee of the unit of general local government generated from the use of CDBG funds regardless of when the CDBG funds were appropriated and whether the activity has been closed out, except in limited circumstances [See also 24 CFR 570.489(e)(2)]. When program income is generated by an activity that is only partially assisted with CDBG funds, the income must be prorated to reflect the percentage of CDBG funds used.

The State CDBG objective for program income is to provide adequate financing for local development to ensure Nebraska's economic prosperity and to use all resources in a timely manner. The State is seeking to provide a policy for use of program income that coordinates local and State resources to the fullest extent possible. The State is responsible for ensuring that program income at the State and local levels is used in accordance with applicable federal laws and regulations.

Program Income Further Defined

Per 24 CFR 570.489(e), program income includes, but is not limited to, the following:

- 1) Proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG funds except in instances where the proceeds are received more than 5 years after expiration of the grant agreement between the state and the unit of general local government. [See also 24 CFR 570.489(e)(2)(v)];
- 2) Proceeds from the disposition of equipment purchased with CDBG funds;
- 3) Gross income from the use or rental of real or personal property acquired by the unit of general local government or subgrantee of the unit of general local government with CDBG funds, less the costs incidental to the generation of the income;
- 4) Gross income from the use or rental of real property, owned by the unit of general local government or other entity carrying out a CDBG activity that was constructed or improved with CDBG funds, less the costs incidental to the generation of the income;
- 5) Payments of principal and interest on loans made using CDBG funds, except in instances where "Payments of principal and interest made by a subgrantee carrying out a CDBG activity for a unit of general local government, toward a loan from the local government to the subgrantee, to the extent that program income received by the subgrantee is used for such payments;" [See also 24 CFR 570.489(e)(2)(iii)];
- 6) Proceeds from the sale of loans made with CDBG funds, less reasonable legal and other costs incurred in the course of such sale that are not otherwise eligible costs under sections 105(a)(13) or 106(d)(3)(A) of Title I of the Housing and Community Development Act of 1974 (as amended);
- 7) Proceeds from the sale of obligations secured by loans made with CDBG funds, less reasonable legal and other costs incurred in the course of such sale that are not otherwise eligible costs under sections 105(a)(13) or 106(d)(3)(A) of Title I of the Housing and Community Development Act of 1974 (as amended);
- 8) Interest earned on funds held in a revolving fund account;
- 9) Interest earned on program income pending disposition of the income;

- 10) Funds collected through special assessments made against nonresidential properties and properties owned and occupied by households not of low- and moderate-income, if the special assessments are used to recover all or part of the CDBG portion of a public improvement; and
- 11) Gross income paid to a unit of general local government or subgrantee of the unit of general local government from the ownership interest in a for-profit entity acquired in return for the provision of CDBG assistance.

Revolving Loan Funds Defined

Per 24 CFR 570.489(f), A revolving loan fund (RLF), for this purpose, is a separate fund (with a set of accounts that are independent of other program accounts) established to carry out specific activities which, in turn, generate payments to the fund for use in carrying out such activities. These payments to the RLF are program income and must be substantially disbursed from the RLF before additional grant funds are drawn from the U.S. Treasury for RLF activities.

CDBG State Revolving Loan Fund (State RLF)

CDBG program income returned to the Department is deposited within the State RLF. The State awards funding from the State RLF through the CDBG Economic Development (ED) Category. Following a successful application, these funds are awarded to local governments to provide a direct loan to a business either through the NDO process or direct loan from the local unit of government.

Projects funded with the State RLF must meet CDBG requirements, including meeting a CDBG National Objective. The national objectives include:

- Benefit Low and Moderate Income Persons
 - LMI persons through the subcategory of job creation/job retention (LMJ), or
 - LMI persons through the subcategory of limited clientele (LMC), or
 - LMI persons through the subcategory of on an area basis (LMA).
- Aid in the Prevention or Elimination of Slum or Blight
- Urgent Need

CDBG Allocation vs CDBG State RLF

When a community applies through the CDBG Economic Development (ED) category or the CDBG Emergent Threat (EM) category, the Department determines whether or not CDBG funds from the Annual Allocation or the State RLF are appropriate for the project.

- **Public and Private Infrastructure Projects:** The *CDBG Allocation* will be used when the community is requesting ED resources for the purposes of infrastructure development. Projects for infrastructure development include public infrastructure (i.e., activities for community owned or controlled infrastructure) and private infrastructure (i.e., streets, and other infrastructure improvements located on privately owned property). Infrastructure projects provide resources utilizing performance-based loans which may include both forgivable loans that are not paid back if a business complies with a CDBG National Objective and other CDBG requirements and grants to communities where no CDBG funds are paid back.
- **Non-Infrastructure Projects:** The *State RLF* will be used when an Economic Development

project includes non-infrastructure related activities that utilize a business loan consistent with the NDO process, or a direct loan to a business by a community.

- **Emergent Threat Projects:** The *State RLF* will be used to assist local units of government that pose a serious and immediate threat to public health, safety or welfare that requires immediate assistance and to cities and counties that see an opportunity to demonstrate sustainable community activities.

Additional policy discussion can be found in the CDBG Application Guidelines, Economic Development Category and Emergent Threat Category.

Program Income – Idle Accounts Must Be Returned

Program Income, including those funds held in an RLF and/or reuse account, cannot be held in perpetuity. Where a local government has Program Income within such an account, if funds are not actively revolving, it may meet the definition of an Idle Account. Funds that are held for 12 months or more without accomplishment or beneficiaries is considered an “idle” account.

PI/RLF accounts are defined as “idle” if one or more of the following is true:

- 1) Local government, or its agent(s), did not identify an eligible project during a 12-month period.
- 2) Local government has funds obligated/awarded but not disbursed within 12 months of the date of the commitment and/or award (i.e., “failed project”).

Active accounts have active projects with a letter of commitment/award that is dated and signed by an authorized official (i.e., the chief elected official). Account activity for determining an “idle” status does not include “non-project” activities such as transferring (or repurposing) funds, charging administrative costs or collecting program income from past transactions (e.g., interest, loan repayments, etc.), etc.

Local government must return Idle Account funds to DED beginning on June 30, 2020, and annually thereafter. Returned funds will be deposited into the State’s RLF. Funds held in an Idle Account must be returned in a timely manner (i.e., 60 days of the state’s fiscal yearend) or the local government will not be considered in “good standing” and additional sanctions may apply, including de-obligation/termination of existing open grants and/or ineligibility to apply for DED resources. This includes CDBG, HOME, HTF and state programs such as CCCFF and NAHTF. For additional information about “good standing”, please see Chapter 2 – Administrative Overview.

How To Repurpose Local Program Income

Local Governments are able to amend their Reuse Plans/RLFs, including making amendments due to Emergency/ Disaster Declarations (i.e., communities have the option to repurpose their local program income). As community needs change, program income reuse plan activities may be expanded to include eligible CDBG activities and must meet the low-and moderate income (LMI) national objective. Below is additional guidance:

- Eligible CDBG Activities
Refer to the CDBG Administration Manual, Chapter 3 for the list of eligible CDBG Activities that

Nebraska has identified as priority activities.

- Eligible National Objective:
Benefit low- and moderate-income (LMI) persons within the subcategories of
 - 1) Area Benefit (LMA);
 - 2) Limited Clientele (LMC);
 - 3) Housing (LMH); and
 - 4) Job Creation/Retention (LMJ).

NOTE: local PI/RLF must use the LMI national objective; therefore, are **not allowed** to use the national objectives of 1) aid in the prevention of slums or blight nor 2) urgent need. At the discretion of DED and in very limited circumstances, waivers may be granted. HUD regulations require a majority of program income funds – including those held by local governments – to meet the National Objective of benefitting LMI persons. For activities meeting an Urgent Need, local governments may apply under the CDBG Emergent Threat category.

- Amending Reuse Plan
If Local Government determines a need to amend their Reuse plan, they need to contact the Department regarding the process and proposed changes. To amend the Reuse Plan, the Local Government must submit the following items to the Department:
 - Letter from the Chief Elected Official identifying:
 - Reason for the change of the Reuse plan,
 - Certification of approval by the local governing body (meeting minutes)
 - Copy of the proposed Reuse plan

The Department will notify the local government of the results of their review for the proposed amended Reuse Plan. **The Department must approve the proposed amended Reuse Plan prior to implementation.**

For additional guidance and resources, reference the *Other Resources & Planning Tools for Re-Purposing Program Income* section at the end of this chapter.

Local Economic Development (ED) Program Income

PROGRAM INCOME AND “CONTINUING THE SAME ACTIVITY”

The local government may retain program income if used to continue the activity from which it was derived, per Federal regulations; otherwise, the State may require the return of program income. The State is permitted to define “continuing the same project activity.”

For the purposes of program income, the State defines “continuing the same project activity” as:

- **Existing Local ED Revolving Loan Fund:** For local governments with existing program income in an existing Local ED Revolving Loan Fund, or who are currently utilizing the NDO process, continuing the same project activity will include providing assistance for the same CDBG eligible activities as defined in the grantee’s Department-approved Local Program Income Reuse Plan (also known as a Local Reuse Plan).

- **No Existing Local ED Revolving Loan Fund (e.g., local unit of government has not established a local ED Revolving Loan Fund):**
 - For ED grantees, program income that was generated from the use of CDBG funds for the awarded activities may utilize the NDO process. In the instance where the NDO process is utilized, continuing the same project activity is defined as providing assistance for the same CDBG eligible activities as defined in the grantee’s Department-approved Local Program Income Reuse Plan (also known as a Local Reuse Plan).

 - For ED grantees, program income generated from the use of CDBG funds awarded activities may be deposited into a newly created Local ED Revolving Loan Fund account. Any program income that is deposited through this process, continuing the same project activity is defined as providing assistance to the same business for the same activity for which it was originally funded.

Local Economic Development Program Income Revolving Loan Funds (Local ED RLF) Policy

The following general rules apply to Local Economic Development Program Income Revolving Loan Funds (RLFs):

- All Local ED RLF must be kept in a separate bank account (preferably interest-bearing).
- All Local ED RLF must employ or contractually retain a CDBG Certified Administrator.
- Administrative costs taken from the Local ED RLF cannot exceed 5% of the Program Income receipted during the semi-annual reporting period.
- Each Local Reuse Plan (including amendments) must be approved by the Department.
- Funds in a Local ED RLF are federal and are subject to all applicable CDBG rules and regulations.
- Funds held in a Local ED RLF, shall in no case, have a balance that exceeds \$750,000. Any amounts in excess of \$750,000 shall be returned to the State.
- Re-purposing (between ED, CD and Housing categories) is allowed, and requires special procedures and an approved Re-Use Plan by DED.
- DED requires funds held in an **Idle Account** be returned

Local Economic Development Program Income and Units of General Local Government

The unit of general local government (UGLG) has the following options for utilizing CDBG program income, including:

- Returning the program income funds to the Department;
- Using the program income within an existing Local ED RLF;
- Establishing a Local ED RLF; or
- Utilizing the NDO process.

Below are the specific requirements that relate to the options each unit of general local government have for their use of program income.

Returning Program Income Funds to the Department

The local government may return program income to the Department using one of the three processes described below.

Where **no Local RLF exists**, the process for returning program income funds includes:

- 1) Sending a cover letter that clearly notes the previous CDBG grant number where the funds originated and that these CDBG program income funds are being returned and
- 2) Sending a check payable to the “Nebraska Department of Economic Development” to the Department for the amount of CDBG funds that the community is returning. (check identifies CDBG grant origination)

Any future program income payments a community may receive, and will be returning to the Department, should be collected by the local government and those funds should be returned to the Department once there is a reasonable balance (e.g., returned every six months, or every year, depending on whether or not there is a reasonable balance).

Where there is an **existing Local RLF, if a local government wishes to return program income and to discontinue the Local RLF**, the process for returning program income funds includes:

- 1) Sending a cover letter that clearly notes that the funds being returned are from the community’s Local ED RLF and that the local government is discontinuing the Local ED RLF;
- 2) Information on any outstanding loans (including the amounts of those loans, copies of the amortizations schedules, etc.); and
- 3) Sending a check payable to the “Nebraska Department of Economic Development” to the Department for the amount of CDBG program income funds that the community is returning.

Any subsequent program income payments that the local government may receive would also be returned to the Department.

Where a local government wishes to **return program income that is in an Existing Local ED RLF and continue to operate the Local ED RLF**, the process for returning program income funds includes:

- 1) Sending a cover letter that clearly notes that the funds being returned are from the community’s Local ED RLF;
- 2) Information on any outstanding loans (including the amounts of those loans, copies of the amortizations schedules, etc.); and
- 3) Sending a check payable to the “Nebraska Department of Economic Development” to the

Department for the amount of CDBG program income funds that the community is returning.

Any subsequent program income payments that the local government may receive would be deposited in the Existing Local ED RLF.

Use of Program Income – Existing Local ED Revolving Loan Fund

In order to retain CDBG program income, and the local government chooses to utilize an existing Local ED RLF, the local government will do so by completing the following steps:

- 1) The local government must provide the Department with a written Notice of Intent to use a Local Economic Development Revolving Loan Fund (Local ED RLF) in order to reuse program income for CDBG eligible activities which are consistent with the definition of “continuing the same project activity” as defined above.
- 2) The local government must administer the Local ED RLF locally and employ the services of a Nebraska CDBG Certified Administrator to administer the Fund.
- 3) The local government will develop and adopt a Revised Local Reuse Plan. The Local Reuse Plan must include:
 - a. A detailed description of the unit of local government;
 - b. A description of who will administer the Local ED RLF, and certify that the entity administering the Local ED RLF has CDBG Certified Administrators;
 - c. A description of the priorities of the program income projects that may be approved by the unit of local government which will be consistent with the definitions of “continuing the same project activity”;
 - d. A Certification that the local government will comply with the Local Reuse Plan that must include, but will not be limited to, the following:
 - i. The local government who is retaining the CDBG program income within a Local ED RLF will comply with all applicable CDBG rules and regulations;
 - ii. The local government understands that the Local ED RLF funds are federal and subject to all applicable CDBG rules and regulations;
 - iii. The local government must complete the proper resolution, public hearings, and environmental review for each additional project funded through the Local ED RLF;
 - iv. The local government understands that funds must be used to significantly benefit the residents of the community that previously received the initial CDBG grant;
 - v. The local government understands that Local ED RLF funds from a community are solely for the benefit of the community that established the Local ED RLF and that these funds cannot be provided to any regional ED program that would assist other communities;
 - vi. The local government understands that all projects will consist of ED activities that benefit low-to-moderate income persons, specifically meeting the national objectives through LMJ, LMC, or LMA.
 - vii. The local government understands that the Department must approve their Local Reuse Plan.

At any time, local governments will have the option to discontinue operating the Local ED RLF and return the program income funds to the Department. The Department will apply the funds to the State CDBG RLF.

The local government will also be required to comply with the following CDBG requirements that include:

- 1) If the initial activity, which generated the program income and is defined as “continuing the same project activity”, has not been completed prior to the first receipt of program income, all program income received must be applied to the current grant activity prior to requesting additional CDBG funds.
- 2) Miscellaneous program income, generated by activities that are not defined as “continuing the same project activity”, must be applied to an open CDBG ED grant prior to requesting additional CDBG funds, or returned to the State.
- 3) Program income funds used from the Local ED RLF must be consistent with the requirements of Revised Local Reuse Plan that must be approved by the Department prior to the local government approving any new applications for activities.
- 4) All program income within the Local ED RLF must be locally monitored and the amount of program income within the Local ED RLF must be reported to the Department. Status updates concerning the outstanding loans or leases shall be submitted on a semi-annual basis. This semi-annual reporting includes, but is not limited to, loans made, payments received, proposed and actual jobs created (or retained) beneficiary data, and amendments to the original loan or lease agreement, as required by the Department.
- 5) All program income earned, as a result of CDBG grant activities, is subject to all requirements of Title I of the Community Development Act of 1974 (as amended) regardless of whether the original grant is open or closed when the program income is received. In addition, all program income expended from the Local ED RLF is subject to all requirements of Title I of the Housing and Community Development Act. This includes all second and subsequent generation loans made from the Local ED RLF.
- 6) Local governments that are currently operating a Local ED RLF and choose to discontinue the operation of the Local ED RLF can return the funds to the Department by following the requirements for “Returning the program income funds to the Department” as noted above.

In addition, the State schedules monitoring with all local governments who have operated or continue to operate a Local ED RLF. At its discretion, the **Department will conduct monitoring**. The State will review loans from previous Program Years. The monitoring will be conducted either via desktop monitoring or onsite monitoring. The State will review local projects for compliance with all CDBG rules and regulations. Findings of non-compliance will result in the State taking appropriate corrective actions for the specific compliance issues discovered.

The Department enters into a CDBG Contract with the local government for each new (original, State-funded) CDBG Project. The Contract includes a process for handling program income generated by the project. The Contract details the procedures for the expected Program Income that is unique to that project.

Establishing a Local ED Revolving Loan Fund

In order to retain CDBG program income, and the local government chooses to establish a Local ED RLF it will do so by completing the following steps:

- 1) The local government must provide the Department with a written Notice of Intent to use a Local Economic Development Revolving Loan Fund (Local ED RLF) in order to reuse program income for CDBG eligible activities which are consistent with the definition of

“continuing the same project activity” that is defined for new ED projects as noted above and includes “providing assistance to the same business for the same activity for which it was originally funded.”

- 2) The local government must administer the Local ED RLF locally and employ the services of a Nebraska CDBG Certified Administrator to administer the Fund.
- 3) The local government will develop and adopt a Local Reuse Plan. The Local Reuse Plan must include:
 - a. A detailed description of the unit of local government;
 - b. A description of who will administer the Local ED RLF, and certify that the entity administering the Local ED RLF has CDBG Certified Administrators;
 - c. A description of the priorities of the program income projects that may be approved by the unit of local government which will be consistent with the definitions of “continuing the same project activity”;
 - d. A Certification that the local government will comply with the Local Reuse Plan that must include, but will not be limited to, the following:
 - i. The local government who is retaining the CDBG program income within a Local ED RLF will comply with all applicable CDBG rules and regulations;
 - ii. The local government understands that the Local ED RLF funds are federal and subject to all applicable CDBG rules and regulations;
 - iii. The local government must complete the proper resolution, public hearings, and environmental review for each additional project funded through the Local ED RLF;
 - iv. The local government understands that funds must be used to significantly benefit the residents of the community that previously received the initial CDBG grant;
 - v. The local government understands that Local ED RLF funds from a community are solely for the benefit of the community that established the Local ED RLF and that these funds cannot be provided to any regional ED program that would assist other communities;
 - vi. The local government understands that all projects will consist of ED activities that benefit low-to-moderate income persons, specifically low- to- moderate jobs.
 - vii. The local government understands that all projects funded through the Local ED RLF must meet a CDBG National Objective; and
 - viii. The local government understands that the Department must approve this Local Reuse Plan.
- 4) The Department must approve Local Reuse Plan. If the Local Reuse Plan is not submitted to the Department as stated within the CDBG contract, the Department will require all program income be returned to the State.

At any time, local governments will have the option to discontinue operating the Local ED RLF and return the program income funds to the Department. The Department will apply the funds to the State CDBG Revolving Loan Fund.

The local government will also be required to comply with the following CDBG requirements that include:

- 1) If the initial activity, which generated the program income and is defined as “continuing the same project activity”, has not been completed prior to the first receipt of program income, all program income received must be applied to the current grant activity prior to requesting additional CDBG funds.
- 2) Miscellaneous program income, generated by activities that are not defined as “continuing the same project activity”, must be applied to an open CDBG ED grant prior to requesting

additional CDBG funds, or returned to the State.

- 3) Program income funds used from the Local ED Revolving Loan Fund must be consistent with the requirements of the Local Reuse Plan that must be approved by the Department prior to the local government approving any applications for activities.
- 4) All program income within the Local ED Revolving Loan Fund must be locally monitored and the amount of program income within the Local ED RLF must be reported to the Department. Status updates concerning the outstanding loans or leases shall be submitted on a semi-annual basis. This semi-annual reporting includes, but is not limited to, loans made, payments received, proposed and actual jobs created, and amendments to the original loan or lease agreement, as required by the Department.
- 5) All program income earned, as a result of CDBG grant activities, is subject to all requirements of Title I of the Community Development Act of 1974 (as amended) regardless of whether the original grant is open or closed when the program income is received. In addition, all program income expended from the Local ED Revolving Loan Fund is subject to all requirements of Title I of the Housing and Community Development Act. This includes all second and subsequent generation loans made from the Local ED RLF.
- 6) Local governments that are currently operating a Local ED Revolving Loan Fund and choose to discontinue the operation of the Local ED Revolving Loan Fund can return the funds to the Department by following the above requirements for “Returning the program income funds to the Department” noted above.

In addition, the State will schedule monitoring visits with all local governments who have operated or continue to operate a Local ED RLF. The State will review loans from previous Program Years. The monitoring visits will be conducted either via desktop monitoring or onsite monitoring. The State will review local projects for compliance with all CDBG rules and regulations. Findings of non-compliance will result in the State taking appropriate corrective actions appropriate for the specific compliance issues discovered, including returning of funds to the State.

Utilizing the NDO Process

A local government may seek to form a subgrantee relationship with a local nonprofit organization to carry out the CDBG activities on behalf of the local government. The local government funded by the State for an ED project, or a local government with an existing Local ED RLF, would grant the CDBG funds awarded to a Nonprofit Development Organization (NDO), such as a community development organization or a local economic development corporation. The NDO must be recognized (through an application process) by the State according to the requirements of 24 CFR 570.204 to carryout funded activities through a contract with the local government grantee for activities in which it retains a direct and controlling involvement and responsibilities for the provision of financial assistance to the community’s ED project.

The activity carried out by the NDO must meet the requirements of Section 105 (a)(15) of the Housing and Community Development Act (HCDA). Section 105 (a)(15) provides the provision, which allows as eligible assistance to neighborhood based nonprofit organizations, local development corporations, and nonprofit organizations serving the development needs of communities in non-entitlement areas to carry out neighborhood revitalization and community economic development projects.

The NDO process includes, but is not limited to, the following:

- The local government, which is a recipient of CDBG Allocation, wishes to make a loan to a for-profit business for economic development activities in accordance with the State’s program

requirements.

- The local government executes an agreement with the NDO, which executes the loan agreement for the CDBG funds loaned to the for-profit business. The NDO, the local nonprofit organization, would use the repayment of the funds from the for-profit business to make additional loans, such as for economic development activities.
- The repayment of the CDBG loan is made to the NDO, and not to the local government, and the NDO retains the payments for future use through a Revolving Loan Fund (RLF), which includes a NDO Reuse Plan approved by the Department through the NDO designation application process. The approved NDO Reuse Plan must ensure that activities funded by the RLF meet broad based economic development investments. The funds repaid to the NDO to continue economic development activities would not be considered program income.
- The NDO reinvests in the community through its established RLF, which can fund additional loans in the service area of the NDO.

For new CDBG Economic Development grants, the local government grantee and the NDO must submit a proposal to the State authorizing the approval of an arrangement between the local government and the NDO for the NDO to carry out the funded activities on behalf of the local government and for repayments to go to the NDO's RLF. The designated NDO must have already received approval from the Department and will have an approved NDO Reuse Plan in place.

Overall, the NDO would carry out the activities of the grant awarded to the local government for assistance to the for-profit business. During this period, the local government would ensure that all CDBG rules and regulations were followed for this initial loan. The repayments from the business to the NDO would not be considered program income, provided that a National Objective has been achieved. Subsequent loans by the NDO using those funds repaid to the RLF would only have to meet those requirements in the Department approved NDO Reuse Plan established by the NDO. The NDO would reinvest funds in broad-based economic development activities.

Local governments currently operating a Local ED RLF may choose to enter into an agreement with a designated NDO to carry out activities with the Local ED RLF. The NDO must be designated by the Department and operate the RLF with a Department-approved NDO Reuse Plan. The NDO must also include the local government in its service area. Once the funds are repaid to the NDO, provided that a national objective has been achieved, the funds would no longer be subject to the CDBG federal rules and regulations, thus providing a pool of Revolving Loan Fund dollars subject only to the requirements of the NDO Reuse Plan.

It will be the responsibility of the local government, in coordination with the NDO, to determine the entity responsible for carrying out the activities of the ED project and the entity who will be responsible for administering the project. In some instances there may be one entity carrying out the project activities and a separate entity administering the grant. Grant administration and carrying out CDBG activities on behalf of the local government grantee are two separate activities.

Local Housing Program Income

The unit of general local government (UGLG) has the following options for utilizing CDBG housing program income that unit of local government may receive. These options include:

- 1) Returning the program income funds to the Department;
- 2) Retaining the program income and using it to continue the same CDBG eligible housing activities;
- 3) Using the program income within an existing Local Housing Revolving Loan Fund (RLF) on CDBG eligible housing activities; or
- 4) Establishing a Local Housing RLF to be used on CDBG eligible housing activities.

PROGRAM INCOME AND “CONTINUING THE SAME ACTIVITY”

Federal regulations also allow the State to require the return of program income provided the local government has an opportunity to retain the program income if the program income will be used to continue the activity from which it was derived. For the purposes of program income, the State defines “continuing the same project activity” as owner occupied rehabilitation and homeownership assistance.

LOCAL HOUSING REVOLVING LOAN FUND VS. REUSE ACCOUNT

Per 24 CFR 570.489(f), a **Revolving Loan Fund (RLF)**, for this purpose, is a separate fund (with a set of accounts that are independent of other program accounts) established to carry out specific activities which, in turn, generate payments to the fund for use in carrying out such activities. These payments to the RLF are program income and must be substantially disbursed from the RLF before additional grant funds are drawn from the Treasury for RLF activities. Such program income is not required to be disbursed for non-revolving fund activities.

A **Reuse Account** is a separate fund established to carry out specific activities that do not generate payments to the account. Per 24 CFR 570.489(e)(3)(ii)(B), if the grant between the State and the unit of local government that generated the program income is still open when it is generated, it will be considered part of the unit of local government’s grant that generated it and must be disbursed before additional grant funds are drawn down from the Treasury for grant activities. If the grant is closed out, the program income will be considered to be part of the unit of general local government’s most recently awarded open grant, regardless of activity.

HOUSING PROGRAM INCOME FUNDS POLICY

The following general rules apply to CDBG Housing Program Income Reuse Accounts and Revolving Loan Funds (RLFs):

- All housing program income must be kept in a separate bank account (preferably interest-bearing).
- All housing program income accounts must employ or contractually retain a CDBG Certified Administrator.
- Certain administrative costs, including those associated with general administrative and housing management, taken from the housing program income account cannot exceed 10% of the program income receipted during the semi-annual reporting period. See Chapter 4 for details.
- Each Local Reuse Plan (including amendments) must be approved by the Department.
- Funds in a housing program income account are federal and are subject to all applicable CDBG rules and regulations.
- Funds held in a housing program income account, shall in no case, have a balance that exceeds \$750,000. Any amounts in excess of \$750,000 shall be returned to the State.
- Re-purposing (between ED, CD and Housing categories) is allowed, and requires special

- procedures and an approved Re-Use Plan by DED.
- DED requires funds held in an **Idle Account** be returned

Below are the specific requirements that relate to the option that the unit of general local government has chosen for its use of program income.

Returning Program Income Funds to the Department

The local government may return program income to the Department using one of the three processes described below.

No Local Housing RLF exists

Where **no Local Housing RLF exists**, the process for returning program income funds includes:

- 1) Sending a cover letter that clearly notes the previous CDBG grant number where the funds originated and that these CDBG program income funds are being returned; and
- 2) Sending a check payable to the “Nebraska Department of Economic Development” to the Department for the amount of CDBG funds that the community is returning. (check identifies CDBG grant origination)

Any future program income payments a community may receive, and will be returning to the Department, should be collected by the unit of local government and those funds should be returned to the Department once there is a reasonable balance (e.g., returned every six months, or every year, depending on whether or not there is a reasonable balance).

Existing Local Housing RLF and Discontinuing Operation

If a unit of local government wishes to **return program income that is in an Existing Local Housing RLF and discontinue the Local Housing RLF**, the process for returning program income funds includes:

- 1) Sending a cover letter that clearly notes that the funds being returned are from the community’s Local Housing RLF and that the local government is discontinuing the Local Housing RLF;
- 2) Information on any outstanding loans (including the amounts of those loans, copies of the amortizations schedules, etc.); and
- 3) Sending a check payable to the “Nebraska Department of Economic Development” to the Department for the amount of CDBG program income funds the community is returning.

Any subsequent program income payments that the local government may receive that were intended to be deposited would also be returned to the Department.

Existing Local Housing RLF and Continuing Operation

If a unit of local government wishes to **return program income that is in an Existing Local Housing RLF and continue to operate the Local Housing RLF**, the process for returning program income funds includes:

- 1) Sending a cover letter that clearly notes that the funds being returned are from the community’s Local Housing RLF;
- 2) Information on any outstanding loans (including the amounts of those loans, copies of the amortizations schedules, etc.); and

- 3) Sending a check payable to the “Nebraska Department of Economic Development” to the Department for the amount of CDBG program income funds that the community is returning.

Any subsequent program income payments that the local government may receive would be deposited in the Existing Local Housing RLF.

Retaining the Program Income and Using it to Continue the Same CDBG Eligible Housing Related Activities

In order to retain CDBG program income that is not in an existing Local Housing RLF, the unit of local government will maintain their program income in a Local CDBG Program Income Account and adopt a Local Reuse Plan that includes a detailed description of the local government, and includes administration and priorities of the program income projects to be approved by the local government which are consistent with the definition of “continuing the same project activity” as described above.

A local government’s Local Reuse Plan must state that all projects will consist of activities that benefit low-to-moderate income persons, specifically low-to-moderate income housing as defined within the local government’s Department-approved Local Reuse Plan, as part of the local government’s contractual requirements with the Department.

At any time, a local government will have the option to discontinue utilizing the housing program income and return it to the Department. The Department will apply the funds to the State CDBG Economic Development Revolving Loan Fund (also known as the State Revolving Loan Fund).

At the end of the calendar year, if the total amount received in a Reuse Account by the unit of local government is less than \$35,000, that amount is no longer reported as program income (24 CFR 570.489(e)). That amount should be removed from the Local CDBG Program Income Reuse Account and de-obligated to the unit of local government. This applies to Reuse Accounts only. All program income received within a Local Housing Revolving Loan Fund never loses its identity as program income and should be reported to the Department.

The local government will also be required to comply with the following CDBG requirements that include:

- 1) If the initial activity, which generated the program income and is defined as “continuing the same project activity”, has not been completed prior to the first receipt of program income, all program income received must be applied to the current grant activity prior to requesting additional CDBG funds.
- 2) Miscellaneous program income, generated by activities that are not defined as “continuing the same project activity”, must be applied to an open CDBG housing grant prior to requesting additional CDBG funds, or returned to the State.
- 3) Program income funds used for additional activities must be consistent with the requirements of the Local Reuse Plan that must be approved by the Department prior to the local government approving any new applications for activities.
- 4) All program income within the Local Housing RLF or Local Housing Reuse Account must be locally monitored and the amount of program income within that account must be reported to the Department. Status updates concerning the program income funds shall be submitted on a semi-annual basis. This semi-annual reporting includes, but is not limited to, grants/loans made, payments received, housing activities, beneficiary data, and amendments to the original loans, as required by the Department.
- 5) All program income earned, as a result of CDBG grant activities, is subject to all requirements

of Title I of the Community Development Act of 1974 (as amended) regardless of whether the original grant is open or closed when the program income is received. In addition, all program income expended from the Local Housing RLF or Local Housing Reuse Account is subject to all requirements of Title I of the Housing and Community Development Act. This includes all second and subsequent generation loans made from the Local Housing RLF or Local Housing Reuse Account.

- 6) Local governments that are currently utilizing a Local Housing RLF or Local Housing Reuse Account and choose to discontinue the operation of that Local Account can return the funds to the Department by following the above requirements for “Returning the program income funds to the Department” noted above.

In addition, the State will schedule monitoring visits with all local governments who have operated or continue to utilize a Local Housing RLF or Local Housing Reuse Account. The State will review project activities from previous Program Years. The monitoring visits will be conducted either via desktop monitoring or onsite monitoring. The State will review local projects for compliance with all CDBG rules and regulations. Findings of non-compliance will result in the State taking appropriate corrective actions appropriate for the specific compliance issues discovered.

Using Program Income – Existing Local Housing Revolving Loan Fund

In order to retain CDBG program income that is in an existing Local Housing RLF, the unit of local government will have to certify and ensure that the Local Housing RLF is properly established in order to meet the Department requirements. This Local Housing RLF would be utilized for the purposes of retaining CDBG program income, and reusing that program income, for the purposes of carrying out specific housing activities, which in turn, generate payments to the RLF for use in carrying out additional housing activities.

If the local government chooses to utilize an existing Local Housing RLF it will do so by completing the following steps:

- 1) The unit of local government must provide the Department with a written Notice of Intent to use a Local Housing Revolving Loan Fund (Local Housing RLF) in order to reuse program income for CDBG eligible activities which are consistent with the definition of “continuing the same project activity” as defined above.
- 2) The local government must administer the Local Housing RLF locally and employ the services of a Nebraska CDBG Certified Administrator to administer the Fund.
- 3) The local government will develop and adopt a Revised Local Reuse Plan. The Local Reuse Plan must include:
 - a. A detailed description of the unit of local government;
 - b. A description of who will administer the Local Housing RLF, and certify that the entity administering the Local Housing RLF has CDBG Certified Administrators;
 - c. A description of the priorities of the program income projects that may be approved by the unit of local government which will be consistent with the definitions of “continuing the same project activity”;
 - d. A Certification that the local government will comply with the Local Reuse Plan that must include, but will not be limited to, the following:
 - i) The local government who is retaining the CDBG program income within a Local Housing RLF will comply with all applicable CDBG rules and regulations;
 - ii) The local government understands that the Local Housing RLF funds are federal and subject to all applicable CDBG rules and regulations;

- iii) The local government must complete the proper resolution, public hearings, and environmental review for each additional project funded through the Local Housing RLF;
 - iv) The local government understands that funds must be used to significantly benefit the residents of the community that previously received the initial CDBG grant;
 - v) The local government understands that Local Housing RLF funds from a community are solely for the benefit of the community that established the Local Housing RLF and that these funds cannot be provided to any regional housing program that would assist other communities;
 - vi) The local government understands that all projects will consist of housing activities that benefit low-to-moderate income persons;
 - vii) The local government understands that all projects funded through the Local Housing RLF must meet a CDBG National Objective; and
 - viii) The local government understands that the Department must approve this Local Reuse Plan.
- 4) The Department must approve Local Reuse Plan. If the Local Reuse Plan is not submitted to the Department as stated within the CDBG contract, the Department will require all program income be returned to the State.

At any time, local governments will have the option to discontinue operating the Local Housing Revolving Loan Fund and return the program income funds to the Department. The Department will apply the funds to the State RLF.

All program income received in a Local Housing Revolving Loan Fund account never loses its identity as program income and should be reported to the Department.

The local government will also be required to comply with the following CDBG requirements that include:

- 1) If the initial activity, which generated the program income and is defined as “continuing the same project activity”, has not been completed prior to the first receipt of program income, all program income received must be applied to the current grant activity prior to requesting additional CDBG funds.
- 2) Miscellaneous program income, generated by activities that are not defined as “continuing the same project activity”, must be applied to an open CDBG housing grant prior to requesting additional CDBG funds, or returned to the State
- 3) Program income funds used from the Local Housing Revolving Loan Fund must be consistent with the requirements of Revised Local Reuse Plan that must be approved by the Department prior to the local government approving any new applications for activities.
- 4) All program income within the Local Housing Revolving Loan Fund must be locally monitored and the amount of program income within the Local Housing RLF must be reported to the Department. Status updates concerning the outstanding loans shall be submitted on a semi-annual basis. This semi-annual reporting includes, but is not limited to, loans made, payments received, housing activities, beneficiary data, and amendments to the original loan, as required by the Department.
- 5) All program income earned, as a result of CDBG grant activities, is subject to all requirements of Title I of the Community Development Act of 1974 (as amended) regardless of whether the original grant is open or closed when the program income is received. In addition, all program income expended from the Local Housing Revolving Loan Fund is subject to all requirements of Title I of the Housing and Community Development Act. This includes all

second and subsequent generation loans made from the Local Housing RLF.

- 6) Local governments that are currently operating a Local Housing Revolving Loan Fund and choose to discontinue the operation of the Local Housing Revolving Loan Fund can return the funds to the Department by following the above requirements for “Returning the program income funds to the Department” noted above.

In addition, the State will schedule monitoring visits with all local governments who have operated or continue to operate a Local Housing Revolving Loan Fund. The State will review project activities from previous Program Years. The monitoring visits will be conducted either via desktop monitoring or onsite monitoring. The State will review local projects for compliance with all CDBG rules and regulations. Findings of non-compliance will result in the State taking appropriate corrective actions appropriate for the specific compliance issues discovered.

Establishing a Local Housing Revolving Loan Fund

In order to retain CDBG program income, the local government may choose to establish a Local Housing RLF. The unit of local government will have to certify and ensure that the Local Housing RLF is properly established in order to meet the Department requirements. This Local Housing RLF would be utilized for the purposes of retaining CDBG program income, and reusing that program income, for the purposes of carrying out specific housing activities, which in turn, generate payments to the RLF for use in carrying out additional housing activities.

If the local government chooses to establish a Local Housing RLF it will do so by completing the following steps:

- 1) The unit of local government must provide the Department with a written Notice of Intent to use a Local Housing Revolving Loan Fund (Local Housing RLF) in order to reuse program income for CDBG eligible activities which are consistent with the definition of “continuing the same project activity” as defined above.
- 2) The local government must administer the Local Housing RLF locally and employ the services of Nebraska CDBG Certified Administrator to administer the Fund.
- 3) The local government will develop and adopt a Revised Local Reuse Plan. The Local Reuse Plan must include:
 - a. A detailed description of the unit of local government;
 - b. A description of who will administer the Local Housing RLF, and certify that the entity administering the Local Housing RLF has CDBG Certified Administrators;
 - c. A description of the priorities of the program income projects that may be approved by the unit of local government which will be consistent with the definitions of “continuing the same project activity”;
 - d. A Certification that the local government will comply with the Local Reuse Plan that must include, but will not be limited to, the following:
 - i) The local government who is retaining the CDBG program income within a Local Housing RLF will comply with all applicable CDBG rules and regulations;
 - ii) The local government understands that the Local Housing RLF funds are federal and subject to all applicable CDBG rules and regulations;
 - iii) The local government must complete the proper resolution, public hearings, and environmental review for each additional project funded through the Local Housing RLF;
 - iv) The local government understands that funds must be used to significantly benefit the

- residents of the community that previously received the initial CDBG grant;
- v) The local government understands that Local Housing RLF funds from a community are solely for the benefit of the community that established the Local Housing RLF and that these funds cannot be provided to any regional housing program that would assist other communities;
 - vi) The local government understands that all projects will consist of housing activities that benefit low-to-moderate income persons;
 - vii) The local government understands that all projects funded through the Local Housing RLF must meet a CDBG National Objective; and
 - viii) The local government understands that the Department must approve this Local Reuse Plan.
- 4) The Department must approve Local Reuse Plan. If the Local Reuse Plan is not submitted to the Department as stated within the CDBG contract, the Department will require all program income be returned to the State.

At any time, local governments will have the option to discontinue operating the Local Housing RLF or Local Housing Reuse Account and return the program income funds to the Department. The Department will apply the funds to the State RLF.

All program income received in a Local Housing RLF account never loses its identity as program income and should be reported to the Department.

Other Cdbg Program Income

Program income generated from other CDBG activities including those under the Community Development Priority (e.g., Comprehensive Development, Comprehensive Revitalization, Comprehensive Investment Stabilization, Public Works, Water/Wastewater, Planning, and Downtown Revitalization) would follow the above mentioned steps with the need for any necessary adjustments related to non-economic development or non-housing activities.

Reporting Program Income

Local governments are required to report program income from all CDBG projects on a semi-annual basis. Reporting periods are:

- July 1 – December 31: **Report due January 30**
- January 1 – June 30: **Report due July 30**

Separate reporting forms are available for Local ED Program Income and Local Housing Program Income on the Department's website, <http://opportunity.nebraska.gov/CDBG>. In order to report other program income from non-ED or non-housing projects, please contact your Program Representative.

Program Income Reports can be submitted to the Department via email. Follow the Instructions for the each type of report for guidance on reporting and timely submissions. Grantees must retain a copy of each Program Income Report in their files.

Note: Local governments, who retain Local ED Program Income, are also required to submit the "Job Creation/Retention Report" to the Department upon the project meeting the National Objective.

Other resources & planning tools for re-purposing program income

For additional information, materials, and other resources to assist you in developing program guidelines, reference the following items:

- **CDBG Policy Memo 19-03:** Program Income and Revolving Loan Fund Updates, including Technical Assistance and Guidance for Re-purposing, Definition of an Idle Account, and Repayment Instructions
- **Planning Tools.** There are three types of planning tools for local governments pursuing use or re-purposing of program income based on activity type. Each tool provides a basic framework, for Economic Development, Community Development, and Housing activities. These tools were originally drafted alongside and included in the abovementioned policy memo, the most current versions are located within the appendices at Appendix, Section 4.

Provided below is a non-exhaustive listing of further reading related to the information included within this chapter. Chapters specifically referenced in the above sections include:

- Chapter 2 – Administrative Overview
- Chapter 3 – CDBG National Objectives & Fundability
- Chapter 4 – Developing Program Guidelines
- Chapter 6 – Environmental Review
- Chapter 14 – Monitoring
- Appendix | Section 4

Appendix 2.2 | AP-90: CDBG Local Program Income

Per 24 CFR 91.320(k)1(iv), the State of Nebraska authorized 124 local units of government to retain program income or establish local revolving fund accounts. Below is a list of local units of government accounts, the estimated amount of funds available to fund eligible projects during the July 1, 2020 - June 30, 2021 program year. Eligible activities to be carried out with this funding include: water/sewer improvements, street improvements, sidewalks, economic development direct financial assistance to for-profit business, owner occupied rehabilitation, lead-based paint testing and mitigation, housing rehabilitation management, and general administration. The national objective to be used by the authorized local unit of governments include low-moderate income jobs (LMJ); low-moderate income housing (LMH), limited clientele (LMC), and low-moderate income on an area basis (LMA). More information regarding all local program incomes accounts will be included in future annual action plans.

NOTE: The number of authorized local units of government may change as the Department reviews the capacity of the local unit of government to retain local CDBG program income.

	Local Government	Estimated Amount Available
1	Ainsworth	\$141,818
2	Allen	\$38,450
3	Alma	\$3,345
4	Atkinson	\$305,019
5	Auburn	\$41,204
6	Aurora	\$5,100
7	Bassett	\$61,443
8	Beatrice	\$320,587
9	Benkelman	\$56,312
10	Blair	\$189,524
11	Bloomfield	\$22,669
12	Brady	\$0
13	Brule	\$5,509
14	Buffalo County	\$107,533
15	Butler County	\$15,157
16	Butte	\$101,380
17	Cambridge	\$39,379
18	Central City	\$8,098
19	Chadron	\$83,010
20	Clearwater	\$10,239
21	Coleridge	\$15,608
22	Columbus	\$329,942
23	Creighton	\$61,224
24	Custer County	\$449,480
25	Dakota City	\$63,690

26	Dawes County	\$136,377
27	Decatur	\$26,260
28	Dodge	\$121,208
29	Edgar	\$4,376
30	Elk Creek	\$79,990
31	Elwood	\$0
32	Emerson	\$114,437
33	Ewing	\$16,287
34	Fairbury	\$40,167
35	Falls City	\$68,494
36	Filley	\$680
37	Fremont	\$24,504
38	Fullerton	\$37,748
39	Geneva	\$16,000
40	Genoa	\$2,807
41	Gering	\$224,706
42	Gothenburg	\$146,735
43	Guide Rock	\$25,974
44	Hartington	\$8,221
45	Hastings	\$99,375
46	Hebron	\$1,445
47	Hitchcock County	\$16,317
48	Holdrege	\$57,673
49	Howells	\$38
50	Humboldt	\$1,804
51	Hyannis	\$2,600
52	Imperial	\$33,549
53	Jefferson County	\$253,348
54	Johnstown	\$30,959
55	Kearney County	\$173,214
56	Kimball	\$158,770
57	Knox County	\$502,796
58	Lancaster County	\$415,545
59	Laurel	\$75,431
60	Leigh	\$77,190
61	Lexington	\$7,400
62	Long Pine	\$12,689
63	Loup City	\$65,766
64	Madison	\$11,507
65	Madison County	\$13,092
66	Meadow Grove	\$17,424

67	Minden	\$15,119
68	Nebraska City	\$84,076
69	Neligh	\$28,897
70	Newman Grove	\$26,000
71	Niobrara	\$61,320
72	Norfolk	\$81,953
73	North Bend	\$1,127
74	North Platte	\$8,532
75	Ogallala	\$81,941
76	O'Neill	\$0
77	Ord	\$42,034
78	Osceola	\$102,519
79	Osmond	\$20,473
80	Overton	\$100,402
81	Oxford	\$168,427
82	Palmer	\$1,604
83	Pawnee City	\$499,565
84	Paxton	\$5,982
85	Pender	\$63,306
86	Perkins County	\$0
87	Peru	\$27,404
88	Pierce	\$56,730
89	Pilger	\$19,147
90	Plainview	\$31,556
91	Platte County	\$31,841
92	Plattsmouth	\$194,749
93	Plymouth	\$97,026
94	Ralston	\$154,306
95	Ravenna	\$32,947
96	Sargent	\$153,150
97	Schuyler	\$446,508
98	Scribner	\$29,247
99	Seward	\$145,136
100	Shelby	\$80,703
101	Sherman County	\$24,871
102	Snyder	\$160,223
103	South Sioux City	\$97,164
104	St. Paul	\$1,376
105	Stanton	\$24,290
106	Stella	\$4,207
107	Stuart	\$175,164

108	Sutherland	\$23,625
109	Tecumseh	\$35,010
110	Tekamah	\$66,785
111	Thurston	\$13,716
112	Tilden	\$24,795
113	Valentine	\$13,026
114	Valley County	\$1,901
115	Verdigre	\$425,080
116	Wakefield	\$0
117	Washington County	\$15,623
118	Wauneta	\$3,739
119	Wausa	\$100
120	Wayne	\$154,966
121	West Point	\$224,317
122	Wheeler County	\$27,875
123	Wymore	\$800
124	York	\$559,180
	Total	\$10,570,182

Appendix 3.1 | HOME Program Additional Information

HOME PROGRAM INCOME

Program income, which the grantee has received or expects to receive as a result of grant activities, should be utilized and in conformance with the grantee's reuse plan as defined within the grantee's approved Program Guidelines for each HOME project.

In general, the Department continues to provide flexibility for housing organizations to use program income, particularly for projects that are funded through the HOME program. The guidance that the Department has provided in the past, and guidance that continues to be relevant today, is that for HOME program income (i.e. reuse funds) an organization should use their program income for the same activities awarded within the original project, or for other housing related activities, as long as the activities are HOME-eligible activities. This information would be noted within the Grantee's, Department approved, Reuse Plan.

For example, if the Department funds a New Construction project, and program income is received, the Grantee should use the program income for additional new construction activities or for other housing related activities as identified within the Grantee's Reuse Plan (i.e. down payment assistance, etc.).

Additional information will be provided regarding the HOME Program Income Requirements within the HOME Application Guidelines.

Guidelines for Resale or Recapture of Home-Funded Projects

DED structures these guidelines based on individual program design and market conditions.

USE OF RESALE PROVISIONS FOR HOME-FUNDED PROJECTS

The HOME Program (92.254(a)(5)) permits either resale restrictions or recapture. DED has elected not to adopt resale as an option for HOME homebuyer activities, and requires homebuyer projects to adopt the recapture method outlined below.

Resale is required only when there is a community land trust or there is no buyer subsidy, and DED has had neither type of project, nor does it intend to fund any such projects under this Plan. If at any time DED determines that a project will require resale restrictions rather than recapture, it will amend these guidelines under the Annual Plan amendment process and request HUD approval.

USE OF RECAPTURE PROVISIONS FOR HOME-FUNDED PROJECTS

DED requires all homebuyer projects to use the “reduction during affordability period” recapture method permitted by 92.254(a)(5)(ii) as outlined below. The homebuyer project developer must adopt this declining balance method as part of its application and program guidelines submitted as part of the application, and DED incorporates these provisions into the written agreement and the Contract Terms and Special Conditions.

When a homebuyer receives direct homebuyer assistance from HOME funds, recapture provisions are placed on the transaction to ensure that HOME funds are recouped if the housing unit does not continue to be the principal residence of the household for the duration of the HOME-required affordability period.

Amount subject to recapture: The HOME investment that is subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit. This includes any HOME assistance that reduced the purchase price from fair market value to an affordable price, but does not include the amount, if any, of development subsidy provided (the amount between the cost of producing the unit and market value of the property).

Any recaptured funds must be used to carry out HOME-eligible activities in accordance with the requirements of 24 CFR Part 92.254.

If the HOME assistance is only used for development subsidy, and therefore not subject to recapture, the resale option must be used.

Net proceeds: the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit during the HOME-required affordability period, the amount recaptured cannot exceed the net proceeds, if any.

If a home is sold to a subsequent low-income homebuyer, and no additional HOME assistance is provided, then the subsequent homebuyer may assume the HOME assistance (subject to the HOME requirements for the remainder of the period of affordability).

When HOME recapture funds are received by the DED grantee, these funds must be utilized for additional HOME-eligible activities and must comply with the HOME rules at 24 CFR Part 92 and must also comply with the DED-approved Homebuyer Guidelines or be returned to DED.

METHOD OF RECAPTURE

The DED grantee must adopt the above provisions and establish additional recapture provisions in the DED grantee’s Homebuyer Guidelines.

1. The DED grantee will recapture the entire amount of the HOME investment from the homeowner, but the amount recaptured cannot exceed the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

For example, a homebuyer receives \$10,000 of HOME down payment assistance to purchase a home. The direct HOME subsidy to the homebuyer is \$10,000, which results in a five-year period of affordability. If the homebuyer sells the home after three years, the DED grantee would recapture, assuming that there are sufficient net proceeds, the entire \$10,000 direct HOME subsidy. The homebuyer would receive any net proceeds in excess of \$10,000.

2. The DED grantee will reduce the HOME investment amount to be recaptured during the affordability period, but the amount recaptured cannot exceed the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than HOME funds) and any closing costs. The amount of investment recaptured would be based on a prorate basis for the time the homeowner has owned and occupied the home.

The pro rata amount recaptured by the DED grantee will be determined by: 1) Dividing the number of years the homebuyer occupied the home by the period of affordability, and 2) Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

For example, a homebuyer receives \$10,000 of HOME downpayment assistance and purchases a home developed with HOME funds for \$10,000 below fair market value. The total direct HOME subsidy to the homebuyer is \$20,000 and requires a 10-year period of affordability. If the homebuyer sells the unit in year 5 of the 10-year period of affordability, the DED grantee would forgive 50 percent of the direct HOME subsidy and recapture 50 percent of the direct HOME subsidy, or \$10,000 of the \$20,000 HOME investment, assuming that there are sufficient net proceeds available.

Using the above mentioned formula of,

$$\frac{\text{Number of years homebuyer occupied the home}}{\text{Period of affordability}} \times \text{Total direct HOME subsidy} = \text{Recaptured Amount}$$

The DED grantee would receive a recaptured amount of \$10,000.

$$\frac{5 \text{ years (homebuyer occupied the home)}}{10\text{-year affordability period}} \times \$20,000 \text{ HOME funds} = \$10,000 \text{ recaptured}$$

ATTACHMENT A

NDED | NATIONAL HOUSING TRUST FUND (HTF) | REHABILITATION STANDARDS

I. PURPOSE OF STANDARDS

- A.** The National Housing Trust Fund Rehabilitation Standards (known herein as the “HTF Standards”) are designed to outline the requirements for building rehabilitation for all Nebraska Department of Economic Development (NDED) National Housing Trust Fund (HTF) funded multi-family housing projects. The HTF Standards are applicable to all NDED HTF-funded rehabilitation projects. The HTF Standards, though a requirement specifically to the development entity in direct receipt of NDED HTF funding, are written to provide guidance to all relevant members of a project development team.
- B.** The goal of the NDED HTF program is to provide functional, safe, affordable and durable housing that meets the needs of the tenants and communities in which the housing is located. The purpose of the HTF Standards is to ensure that property rehabilitation puts each building in the best possible position to meet this goal over its extended life and that, at a minimum, all health and safety deficiencies are addressed.
- C.** If a project is out of compliance with the HTF Standards, the grantee shall bring to the attention of NDED staff the specific portion of the project which does not comply, stating the reasons for non-compliance. NDED staff will make a determination as to whether an exception to the HTF Standards shall be granted.
- D.** Note: At the time of publication and adoption of the HTF Standards, the adopted codes referenced are believed to be those in force. As standards and codes change and are put into effect by the governing authorities having jurisdiction, the new standards and codes will apply in lieu of those referenced.

II. QUALITY OF WORK

- A.** Quality of Work: Grantees and developers shall ensure that all rehabilitation work is completed in a thorough and workmanlike manner in accordance with industry practice and contractually agreed upon plans and specifications as well as subsequent mutually agreed upon change orders during the construction process. Grantees and developers will employ best practice industry standards relating to quality assurance to verify all work completed.
- B.** Project Design Professionals
 1. Projects will be designed by licensed professionals per applicable Nebraska Fire & Building Codes.
 2. The project developer will formally contract with licensed architectural and engineering design professionals to provide appropriate professional services for each project. It is the responsibility of each licensed professional to assure that the scope of work is done in accordance with the generally accepted practices in their discipline, as well as designing the project to be in full conformance with all the applicable Federal, State and local codes. (See Section III below.)
 3. In addition, the architect or engineer will provide contract specifications which stipulate quality standards, materials choices and installation methods and standards. Such

specifications may reference other appropriate standards set by different trades associations and testing agencies such as ASTM, Underwriters Laboratory (U/L), Tile Council of America, Gypsum National Roofing Contractors Association (NRCA) Architectural Woodwork Institute, SMACNA, ASTM, AFME, etc.

- C. By meeting the various code requirements as a minimum standard, together with the other standards herein or in attendant NDED policies, each building rehabilitation project is assured to be brought up to an acceptable level of rehabilitation.
- D. Warranties shall be required per the standard construction contracts on all materials, equipment and workmanship.

III. CODE COMPLIANCE

- A. All work shall comply with all applicable Nebraska state and local codes, ordinances, and zoning requirements.

Applicable state codes include but are not limited to:

1. ICC, International Building Code (IBC), 2018
 2. International Existing Building Code, 2018
 3. International Energy Conservation Code, 2018
 4. Nebraska Uniform Energy Efficiency Standards, §§81-1608 to 81-1626, Reissue Revised Statutes of Nebraska (2018)
 5. International Residential Code, 2018
 6. Nebraska State Fire Code Regulations, Title 153
 7. NFPA 1, Fire Code, 2012
 8. NFPA 101, Life Safety Code, 2012
 9. Uniform Plumbing Code (UPC), 2009, per LB 42, 2012
 10. Nebraska Elevator Statutes, Neb. Rev. Stat. §§48-2501 to 48-2533; and Code, Title 231, Chapter 1
 11. ADA Standard for Accessible Design, 2010
 12. Nebraska Department of Economic Development Minimum Standards for Rehabilitation
- B. Please note that the NDED HTF grantee must demonstrate compliance with all state and local codes through project affiliation with professional design team drawing certifications (e.g. architectural design stamp) and/or other approved methods such as state inspector certification.
 - C. A code review analysis will be produced by the project's design professionals itemizing the applicable codes for each area of discipline.
 - D. The HTF Standards are designed to exceed the Uniform Physical Condition Standards (UPCS) and ensure that upon completion, the HTF-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. See Attachment B attached hereto for a list of Inspectable Items and Observable Deficiencies, including descriptions of the type and degree of deficiency for each item that any HTF-assisted project must address, at a minimum.

IV. HEALTH AND SAFETY

- A. If the housing is occupied at the time of rehabilitation, any life-threatening deficiencies must be identified and addressed immediately. See Attachment B for a list of Inspectable Items and Observable Deficiencies, including the identification of life-threatening deficiencies (highlighted in orange) for the property site, building exterior, building systems, common areas, and units.

V. SCOPE OF WORK DETERMINATION

- A. In developing scopes of work, grantees and developers will work with NDED to ensure that all requirements under the HTF Standards are satisfied and that the proposed scope of work meets the goals of Part I above. NDED approval of all scopes of work is required.

VI. EXPECTED USEFUL LIFE / REHABILITATION SCOPE & CAPITAL PLANNING

- A. In developing scopes of work on housing rehabilitation projects NDED HTF grantees and developers will consider the remaining expected useful life of all building components with regard to building long-term sustainability and performance. Specifically, each building component with a remaining expected useful life of less than the applicable HTF period of affordability (30 years) shall be considered for replacement, repair or otherwise updated. Additionally, new building components with an expected useful life of less than 30 years shall be considered for future replacement. For multifamily housing with 26 or more total units, the useful life of systems must be determined through a capital needs assessment that determines the work to be performed and identifies the long-term physical needs of the project.
- B. Project capital needs assessments (CNAs) are required for multifamily housing with 26 or more total units; the CNA's must determine the useful life of systems and the work to be performed, including identifying the long-term physical needs of the project. The industry standard period for CNA's is 20 years; however, project CNA's must be updated every five years during the life of the project to ensure projected capital needs through the 30-year HTF affordability period are anticipated and planned for. The initial CNA will cover years 1-20. The first 5-year update will be done in year 5 and cover years 6-25. The second 5-year update will be done in year 10 and will cover years 11-30.
- C. Once a scope of work has been developed by the grantee and their development team, the grantee must also develop a capital plan in compliance with the Capital Needs Assessments. Whether or not a particular building component has been replaced, repaired or otherwise updated as part of the rehabilitation scope of work, all building components and major systems must demonstrate adequate funding to be viable for at least 20 years, the length of the capital plan, with subsequent updates every five years during the 30-year affordability period.
 - Example #1: Kitchen cabinets with a remaining useful life of 8 years may be permitted to be left in place and not included in the rehabilitation scope. However, adequate funding shall be demonstrated in the building capital plan to replace those cabinets in year 8 of the post-rehabilitation capital plan.
 - Example #2: If a building component such as a new roof is installed during the rehabilitation and this roof has an expected useful life of 25 years, it will not show up on the initial CNA as needing replacement during that 20-year period. However, since NDED requires updates of CNA's to be performed every 5 years, it will show up on the next 20-year CNA which will be performed in year 5 of the project and cover years 6-25. During these 5-year CNA updates, the project reserve contributions will be reviewed to ensure all future capital expenditures articulated in the CNA are adequately funded through the 30-year affordability period.
- D. Monthly replacement reserves contributions of at least \$50 per unit per month are required through the 30-year affordability period. If the initial 20-year CNA and capital plan

(and/or any subsequent 5-year updates) indicate that replacement costs for the period exceed the amount generated by a \$50 per unit per month contribution, a higher per unit per month contribution will be required.

- E. Grantees and their development teams should ensure that all building components are analyzed as part of a comprehensive effort to balance rehabilitation scope and capital planning in a way which maximizes long-term building performance as much as possible within the parameters of both development and projected operational funding available.

VII. ENERGY EFFICIENCY

- A. All NDED HTF-funded projects shall be subject to the 2009 International Energy Conservation Code, Nebraska Uniform Energy Efficiency Codes, and guidance on energy efficiency as found within the NDED Minimum Standards for Rehabilitation. All projects will either achieve the target energy efficiency objectives of the standard or present NDED with an operational case for project sustainability pursuant to the financial structure of the project.
- B. In both the design and implementation of project rehabilitation scopes of work, particular emphasis should be made to maximize the effectiveness of the energy efficiency related work scopes.

VIII. DISASTER MITIGATION

- A. To the extent applicable/relevant, the housing must be improved to mitigate the potential impact of potential disasters (e.g. tornadoes, floods, wildfires) in accordance with state or local codes, ordinances, and requirements, or such other requirements that HUD may establish.
- B. Specifically regarding flood hazards, a relevant potential natural disaster for the State of Nebraska:
 - 1. Projects shall meet FEMA federal regulation, and HUDs' floodplain management requirements at 24 CFR 55, including the 8-Step Floodplain Management Process (when applicable) at 24 CFR 55.20.
 - 2. Projects shall meet fluvial erosion prevention requirements per local municipality regulations.
- C. Specifically regarding tornadoes, another relevant potential natural disaster for the State of Nebraska:
 - 1. Projects shall meet applicable federal, state, and local codes and design considerations will be made for ensuring new construction includes a basement (if applicable and feasible) or a safe room. Rehabilitation of existing properties will include an evaluation of tornado safety features within the property.
 - 2. Applicable FEMA guidance will be consulted, as appropriate, including FEMA P-320 "Taking Shelter from the Storm: Building a Safe Room for Your Home or Small Business" and FEMA P-361 "Safe Rooms for Tornadoes and Hurricanes: Guidance for Community and Residential Safe Rooms, Third Edition (2015)" found at:
 - 3. <https://www.fema.gov/fema-p-320-taking-shelter-storm-building-safe-room-your-home-or-small-business> and <https://www.fema.gov/media-library/assets/documents/3140>

IX. BIDDING AND PROJECT MANAGEMENT

- A. All projects will be bid in accordance with procurement provisions of federal law found at 2 CFR §§200.318 through 200.326 and State Law which applies to all NDED HTF-funded projects. Grantees and developers will submit a project management plan with their application which will outline how the project will be managed (e.g. General Contractor (GC) bid project, Construction Management (CM) project or other project management plan). Any changes to project management operational structure which substantially varies from the plan provided to NDED at the time the HTF funding is awarded requires prior notification to NDED HTF staff.

X. PROJECT ARCHITECTURAL REHABILITATION DESIGN STANDARDS

A. BUILDING OCCUPANCY & CONSTRUCTION TYPE

- 1. Fire resistance rating separation requirements per code
- 2. Shall comply with NFPA 1 and NFPA 101, Chapters 8 & 43

B. HISTORIC BUILDINGS

- 1. Shall comply with NFPA 101, Chapter 43.10.4
- 2. Shall comply with IBC, Chapter 3409

- C. Historic buildings shall be rehabilitated in a manner consistent with the requirements of Section 106 of the National Historic Preservation Act and the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitation of Historic Buildings and with consultation of the Nebraska State Historic Preservation Office (SHPO).

D. ACCESSIBILITY REQUIREMENTS

- 1. Housing that is rehabilitated with HTF funds must meet all applicable federal and state regulations regarding accessibility for persons with disabilities. An overview of these requirements is provided below; however, the applicability of these rules is complex and therefore it is recommended that developers seeking HTF funds consult with a qualified design professional.
- 2. General Requirements:
 - a. Projects shall meet applicable Federal and State Regulations and Rules
 - b. The number of accessible apartment units shall be determined by the code requirements
 - c. Projects shall comply with the American's with Disabilities Act (ADA), Title II (for public entities) and Title III (for places of public accommodations) implemented at 24 CFR parts 35 and 36, and 2010 ADA Standard for Accessible Design and attendant Design Guide (DOJ), as applicable
 - d. Projects, if applicable, shall comply with the Fair Housing Act, which states in part that covered multifamily dwellings as defined by HUD's implementing regulations at 24 CFR 100.201 must meet the design requirements at 24 CFR 100.205 and that the Fair Housing Act Amendments of 1988 (as amended) with consideration being given to the accessibility/adaptability of units to handicapped occupancy.
 - e. Rehabilitation of existing buildings constructed and first occupied prior to March 13, 1991, that may be exempt from the Architectural Guidelines adopted in the Fair Housing Act Amendments of 1988 will ensure compliance with applicable federal, state, and local building codes and will include compliance with applicable Section 504 requirements.
- 3. Projects shall comply with other standards as may apply or be required by funding sources (i.e. USDA Rural Development)

4. Projects, if applicable, shall comply with Section 504 of the Rehabilitation Act of 1973 implemented at 24 CFR Part 8
 - a. For “substantial” rehabilitation (projects with 15 or more total units and the cost of rehabilitation is 75% or more of the replacement cost):
 - i. At least 5% of the units (1 minimum) must be made fully accessible for persons with mobility impairments based on the Uniform Federal Accessibility Standards (UFAS)
 - ii. In addition, at least 2% of the units (1 additional unit minimum) must be made accessible for persons with sensory impairments.
 - iii. Common spaces must be made accessible to the greatest extent feasible
 - b. For projects with “less-than-substantial” rehabilitation (anything less than “substantial”), the project must be made accessible to the greatest extent feasible until 5% of the units are physically accessible, and common spaces should be made accessible as much as possible.
5. Projects, if applicable, shall comply with all Accessibility/Adaptable Dwelling requirements of the Fair Housing Act of 1988; applicable Uniform Federal Accessibility Standards (UFAS); and any applicable requirements of ANSI A117. These may include, but are not limited to:
 - a. The structures shall all be on an accessible route, in and through the Unit;
 - b. A proper number of units will be fully accessible and may target Special Needs households which may include the 5% minimum requirement per UFAS and ADA;
 - c. Units will have ADA Thresholds on all front Doors;
 - d. Units will have a removable Front and Panel on the Kitchen Sink;
 - e. Units will have reinforcement for future grab bars in all bathrooms, tubs, and showers;
 - f. Units will have Convenience receptacles, Switches, and controls mounted between 15” and 48” to the usable part of the device;
 - g. Units shall have 36” wide doors;
 - h. Units shall have ADA Lever handles on all hardware;
 - i. Units shall have the required floor space requirements for ranges, sinks, water closets, and lavatories;
 - j. Door swings will have 18” clearance beside the Latch side of the door, if the door swings into the direction of travel.

E. BUILDING DESIGN

1. The project developers are encouraged to draft an architectural program document outlining the goals for the project.
2. Building access – in general the access to a building shall be safe, logical, readily identifiable, sheltered from the weather, and meeting the exit requirements to a public way. Pathways of circulation within a building shall also be safe and logical.
3. Means of egress components shall be in conformance with Chapter 7 of NFPA 101, including complete layout of the exits, corridor and stair dimensional requirements and arrangement, doors sizes and swings, door hardware, panic exit devices, door self-closers, interior finishes, walking surfaces, fire separations, stair enclosures, guards and railings, ramps, occupant load calculations, illumination, and signage.
4. Apartment layout:
 - a. Room sizes –minimum in accordance with IBC 1208 and/or local codes.
 - b. Interior environment shall comply with Chapter 12 of the IBC.
 - c. Kitchens – in general, for apartment buildings – each unit will have a functional and code-compliant kitchen
 - i. SRO's and other special housing types may be an exception
 - d. Baths – in general, for apartment buildings – each unit will have a functional and code compliant bath in accordance with IBC 1210
 - i. SRO's and other special housing types may be an exception
5. Storage – adequate clothes closets, pantry and general storage shall be provided.
6. Amenity Spaces - provision for laundry facilities, bike storage, trash & recycling, and other utility or common spaces may be made in accordance with the goals of the project program. The project developers are encouraged to consider adding such amenities as may be appropriate to enhance the livability of the housing for the tenants.
7. Solid Waste Disposal – provision shall be made to enable the tenants and property management staff to handle and store solid waste in compliance with current State and Federal regulations.
8. Existing outbuildings and utility structures which are being retained, shall be in sound and serviceable condition, and not create health, safety, or undue maintenance issues for the project.

XI. REHABILITATION CONSTRUCTION STANDARDS

A. SITE

1. General:
 - a. Assure that the site is safe, clean and usable, and designed with details, assemblies and materials to provide ongoing durability without undue future maintenance.
 - b. Site design and engineering shall be by a licensed professional civil engineer, or other qualified professional.
 - c. Design and systems shall conform to all applicable codes, rules and regulations:
 - i. Local and municipal zoning
 - ii. Local and State Fire and Building Codes, current adopted addition
 - iii. Nebraska State Fire Code Regulations, Title, 153
 - iv. NFPA Codes as they may apply
 - d. Permits - Any and all permits, bonds or licenses required for the execution of the work specified by the Work Write-Up shall be obtained and paid for by the Contractor prior to the start of that work. Contractors and subcontractors will be responsible for obtaining any progress or final inspections from the local jurisdiction's building departments. Failure to call for the required inspections or proceeding without inspection, such as covering work without approval and deviating from approved plans and specs, may result in violations that could include no payment. Upon project completion, each unit must be decent, safe, sanitary, and in good repair.
2. Sprinkler water service – Underground water service as required for building sprinkler system shall be in accordance with NFPA 24.
3. Drainage – assure that the grading surrounding the building will slope away from the building and drain properly, without ponding or erosion.
4. Sewer connections to municipal sewage systems and on-site sewage disposal:
 - a. Existing sewer laterals that are to be reused should be evaluated to assure that they are serviceable and have a remaining useful life of 30 years, or are covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - b. New systems designed to conform to the State “Wastewater System & Potable Water Supply Rules” (WW permit) regulations.
5. Water service:
 - a. Existing municipal water supplies to buildings shall be evaluated to assure that they are serviceable, of adequate capacity and have a remaining useful life of 30 years, or are covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - b. Required new systems shall be designed to conform to the State “Wastewater System & Potable Water Supply Rules” (WW permit) regulations, and the American Waterworks Association (AWWA) guidelines.
6. Vehicular access to public way – site design shall conform to local zoning and transportation regulations, as well as be sensible in its layout to maximize vehicular and pedestrian safety.
7. On-site Parking – parking shall be adequate for project type, meet local codes, and be designed to drain well, with a durable appropriate surface material. Handicapped parking shall be provided as required. Designers may utilize Institute of Transportation Engineers

(ITE) guidelines in the design.

8. Pedestrian access and hardscape – In general, paved walkways within the site will be designed to provide sensible pedestrian access from the public way into the site, from parking areas, and provide access to buildings. All walkways should generally conform to applicable codes for width and slopes, and fall protection. Site stairs shall be safe and sound, constructed of durable materials, with proper rise and run, and with code approved railings as required. Accessible routes into buildings shall be provided as required by code.
9. Site amenities – site amenities may be provided which enhance the livability of the project including playground areas, seating, benches, patio areas, picnic tables, bike racks, grills, and fencing, etc.
10. Mailboxes - Provision will be made for USPS-approved cluster mailbox units if required by the USPS.
11. Landscaping – lawns, ground cover, planting beds, perennial plants, shrubs and trees may be provided to enhance the livability, and to provide a positive aesthetic sense.
 - a. Planting choices specified should be low maintenance, non-invasive species, of an appropriate size and scale and located, when adjacent to building structures, with regard to their size at maturity.
12. Solid waste collection & storage – if necessary, provision shall be made for the outdoor storage and collection of solid waste and recycling materials in receptacles (dumpsters, wheeled trash cans, totes). Enclosures may be provided and should be accessible as required by code.
13. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
14. Fuel Storage – Onsite outdoor placement and storage of fuels per applicable regulations and utility requirements.
15. Underground or overhead utilities – as regulated by code and utility rules.

B. FOUNDATIONS

1. Existing foundations shall be examined by qualified professionals
 - a. Foundations to be adequately sized, free of broken components or deterioration which may compromise the load bearing structural integrity.
 - b. Design and implement structural reinforcements or reconstruction as necessary.
2. Above-grade masonry unit block or brick shall be reasonably stable, plumb and sound with no missing units or voids.
3. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly.
4. New below-grade structures to conform to Chapter 18 of IBC as appropriate.
5. Basement floors:
 - a. Mechanical rooms - Provide sound concrete floors with raised housekeeping pads for equipment.
 - b. Tenant accessed utility spaces (storage, laundry rooms, etc.) – provide sound concrete floors.
 - c. Dead spaces
 - i. provide concrete rat slabs,
 - ii. where earthen floors are to remain, provide wear layer of peastone (or

similar suitable material) over vapor barriers.

6. Moisture mitigation
 - a. Water and damproofing – where possible and as may be required by existing conditions of groundwater and stormwater intrusion into subsurface portions of buildings, provide waterproofing or damp proofing as appropriate.
 - b. Provide vapor barriers covered with a wear layer of pea-stone over earthen basement or crawl space floors to remain.
 - c. Ventilation of basements and crawl spaces per IBC, Chapter 1203.

C. MASONRY COMPONENTS

1. Buildings with masonry bearing walls shall be examined for their structural integrity. Existing masonry building components shall be examined to assure sound condition, and repaired as necessary to provide the load-bearing capacity, resistance to water penetration, and aesthetic quality to assure the assemblies will perform for the purpose intended.
 - a. Masonry shall be plumb, and structurally sound.
2. Repair or replace deteriorated portions or missing units.
 - a. Brick veneer shall be sound, or repaired to be sound.
3. Masonry mortar joints shall be sound, and free of loose or deteriorated mortar, with no voids.
 - a. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly, and prevent water intrusion.
4. Historic masonry designated to remain shall be restored to sound serviceable condition, and in accordance with Section 106 of National Historic Preservation Act.
 - a. Where masonry is considered historic, repairs will be carried out utilizing the Secretary of the Interior’s “Standards of Rehabilitation” and related NPS Preservation Briefs for “Repointing Mortar Joints on Historic Masonry Buildings”
5. Chimneys
 - a. Assure structural integrity, reconstruct, and point as necessary
 - b. If used for fuel heating appliances – provide lining as may be required by code and as prescribed by the heating appliance manufacturer.

D. STRUCTURE

1. A qualified professional shall examine each building’s load-bearing structure, and assess its existing condition to determine suitability of continued use.
2. In general, structure evaluation and design shall be in conformance with International Building Code requirements.
 - a. In most residential rehab projects where there is no change in use, it is not expected that the structure will be brought up to new construction standards.
 - b. Consideration shall be given if there are any proposed changes in use which would impact the historical loading.
3. Deficiencies identified shall be addressed and repairs designed and specified as necessary to correct such conditions:
 - a. Repairs shall be made to any deteriorated load-bearing structural elements.
 - b. Reinforce, install supplemental or replace structural members determined not to be adequate for use.

E. ENCLOSURE - SHELL

1. Roofing

a. Existing

- i. Examine existing roofing and flashing systems to determine suitability for continued use. Continued life expectancy of existing roofing should be a minimum of 30 years, or covered by the 20-year Capital Plan and/or subsequent 5-year updates during the 30-year affordability period.
- ii. Repair existing roofing as required.
- iii. Existing historical slate roofs shall be repaired in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements if applicable.

b. New Roofing

- i. New roofing shall be installed where existing roofing does not meet requirements for continued use.
- ii. New roofing system components shall be compatible, and include - the nail base, the underlayment layer, ice & water shield self-adhesive membrane flashings, metal flashings and roofing.
 - Strip existing roofing and dispose of properly.
 - Examine exposed existing substrate for structural soundness
 - Install new roofing system per code and per NCRA trade practices, and manufacturer specifications.
 - Flashings – deteriorated flashings shall be replaced, and the weather proof integrity of the roof system shall be assured.

c. Ventilation

- i. Roof assemblies shall be properly ventilated in accordance with applicable code requirements, and appropriate building science detailing.

2. Exterior Finishes

a. Cladding

i. Wood Siding –

- Examine existing siding for soundness – shall be free of major cracks, rot, and other deterioration which may compromise its useful life and be suitable to hold exterior paint.
- Siding shall be free of gaps and holes and provide continuous weatherproof system.
- Repair or re-side as necessary to provide a weather resistant enclosure.
- Replace existing wood siding on historic buildings as necessary in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.

ii. Masonry

- Masonry bearing walls and veneers shall be restored as necessary
 1. Refer to Section XI. C. – Masonry
 2. Refer also to Section XI F.2.b – Enclosure Thermal for insulation requirements
 3. All work on historic masonry shall be done in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.

- iii. Other existing cladding system types and materials shall be repaired and/or restored in-kind with matching or similar materials to provide a durable weather resistant enclosure.
- 3. Trim – Exterior trim and architectural woodwork.
 - a. Existing wood trim:
 - i. Existing trim to remain must be sound, free of defects and deterioration which compromises its use.
 - ii. Repair and restore trim to usable condition. Patch or replace in kind any deteriorated wood trim components.
 - iii. Repair of historic woodwork and trims shall be in accordance with the Secretary of the Interior’s “Standards for Rehabilitation” project requirements.
 - b. New wood trim shall be installed in a workmanlike manner. Reference may be made to Architectural Woodwork Institute (AWI) standards.
 - c. Other trim materials (PVC, cementitious, etc.) which are suitable may be used as appropriate and shall be installed per manufacturer’s recommendations.
 - d. Trim which is part of the weather tight enclosure shall be flashed or caulked with joint sealers as necessary to prevent water intrusion.
- 4. Paint
 - a. In general, all existing exterior wood surfaces shall receive new paint coatings, except as appropriate due to the recent application of paint and/or the sound condition of existing coatings.
 - b. Examine surfaces and apply paint only to sound acceptable materials / surfaces.
 - i. Prepare surfaces properly, removing loose or peeling previous paint.
 - ii. Paint prep shall be done in accordance with applicable lead safe standards. (See also Section XI N.1.b-Special Construction)
 - c. Before painting, assure that any moisture issues which may compromise the life expectancy of the paint system are remedied.
 - d. Exterior paint systems shall be compatible, and installed in accordance with manufacturers’ specifications.
- 5. Porches, decks and steps
 - i. Existing porches, decks, steps and railings proposed to remain shall be examined and repaired as necessary. Repair and reconstruction shall be carried out to assure that they will have a continued useful life of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - ii. Inspect structure for soundness and reconstruct any deteriorated members as required.
 - iii. Install new support piers as may be required.
 - iv. Patch existing decking with matching materials, or install new durable decking.
 - a. Railings
 - v. shall be sound and adequately fastened to meet code requirements for structural loading. Repair or replace in-kind as appropriate.
 - vi. Shall meet code requirements for height of protective guards, or have supplemental guards installed.

- b. Steps shall be safe and sound and meet applicable codes, with railings as necessary.
- c. Historic porches designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior’s “Standards for Rehabilitation” project requirements.
- d. All porch elements shall be able to withstand the weather elements to prevent premature deterioration.

F. ENCLOSURE – THERMAL

- 1. Energy Efficiency - In general, most buildings will be rehabbed with a goal of increasing the thermal shell efficiency.
 - a. All NDED HTF-funded projects shall be subject to the 2009 International Energy Conservation Code and guidance on energy efficiency as found within the NDED Minimum Standards for Rehabilitation. All projects will either achieve the target energy efficiency objectives of the standard or present NDED with an operational case for project sustainability pursuant to the financial structure of the project.
 - b. In both the design and implementation of project rehabilitation scopes of work, particular emphasis should be made to maximize the effectiveness of the energy efficiency related work scopes.
- 2. Insulation
 - a. Insulation levels shall conform to the NDED’s Minimum Standards for Rehabilitation.
 - b. Masonry walls shall be insulated utilizing current building science detailing to ensure ongoing integrity of masonry systems.
- 3. Air sealing – comply with the NDED’s Minimum Standards for Rehabilitation.
 - a. Attention must be paid to the air barrier of each building and should be well thought out, detailed, and carefully executed.
 - b. Blower door testing shall be performed to verify compliance and successful execution.
- 4. Indoor air quality
 - a. In general, all thermal upgrades to a building will take into consideration indoor air quality and moisture control/mitigation, and apply the current state of the art building science in this regard. Treatment of existing stone, concrete or masonry basement walls, and of existing basement earthen floors or uninsulated basement slabs will be taken into consideration with regard to the need for moisture mitigation.
- 5. Ventilation
 - a. Venting of crawl spaces, attics and sloped ceilings shall be per code.
 - b. See Section XI E.1.c for roof assembly ventilation.

G. ACOUSTICAL TREATMENTS

- 1. Dwelling units separated acoustically using Chapter 1207 of IBC as a guideline minimum standard.

H. DOORS

- 1. General
 - a. Doors to meet code requirements of NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 &

30.2.2.2

- b. Meet egress requirements for dimensions, swing and clearances, and be accessibility compliant as required.
 - c. Be sound and secure.
 - d. New doors shall be installed per manufacturers' recommendations and standard trade practice standards.
 - e. Flash properly, and have shim spaces insulated.
 - f. Existing doors to remain should be examined and determined to be suitable for reuse with a remaining life after restoration of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - i. Restore as required to provide useful life.
 - ii. Shall be tested and modified as necessary to operate properly.
 - iii. Install new weather stripping and sweeps to provide seal against weather elements and air infiltration.
 - iv. Historic doors designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
2. Apartment doors
 - a. Apartment unit entry doors shall be fire rated as required.
 3. Other doors – Access doors shall meet code requirements for fire rating.
 4. Door hardware shall operate properly, be secure and shall meet accessibility standards and NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2.

I. WINDOWS

1. Windows shall be of legal egress size when required by code
2. Existing windows:
 - a. Existing windows to remain should be examined and determined to be suitable for reuse with a reasonable remaining life after restoration of 30 years without undue future maintenance, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - b. Capable of providing adequate seal against air infiltration, weather elements, and be determined to be appropriately energy efficient in keeping with the overall energy efficiency strategy of the project.
 - c. Install new weather stripping to provide seal against weather elements and air infiltration.
 - d. Air seal shim spaces and window weight pockets if possible.
 - e. Restore and modify as required to provide useful life.
 - f. Shall be tested and modified as necessary to operate smoothly and properly per code.
 - g. Historic windows designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
 - h. Hardware shall be intact and operational, or be replaced with new hardware as required.
3. New Windows:

- a. Where existing windows do not meet the standards for egress, condition, and/or energy efficiency deemed appropriate to the project, they shall be replaced by new windows.
- b. New windows shall be code compliant, and conform with NDED's Minimum Standards for Rehabilitation. Developers are encouraged to consider upgrading to greater energy efficient windows by providing R-5 windows.
- c. Additionally, new window units should be tested assemblies meeting ASTM standards for water penetration & air leakage.
- d. All windows shall be installed per manufacturer's installation guidelines and specifications, and shall incorporate appropriate detail, flashings, joint sealers, and air sealing techniques.

J. INTERIOR FINISHES

1. In general, all interior finishes will be new and installed per manufacturer's recommendations and the standards of quality construction per trade practices and associations related to the particular product or trade.
2. Per chapter 10 of NFPA 101 (Reference also Chapter 8 of the IBC).
3. Walls & ceilings
 - a. Where existing finishes are proposed to remain, they will be determined to meet the standard of being sound, durable, lead-safe, and have a remaining useful life of no less than 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - b. Where existing finishes are proposed to remain as part of a fire rated assembly, the State DPS shall assist in making a determination as to the suitability. Refer to codes as they pertain to archaic materials, and relevant NPS Preservation Briefs.
4. Flooring
 - a. Existing wood flooring in good condition should be repaired, sanded and refinished.
 - b. All new flooring materials (resilient flooring, wood flooring, laminate flooring, carpet, and/or ceramic tile) shall be installed over suitable substrates per manufacturer's specs and the trade association practices.
5. Trim - Wood trim and architectural woodwork
 - a. Existing trim shall be repaired and restored to usable condition, free of deterioration which compromises its use. Repair of historic woodwork & trims shall be in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
 - b. New wood trim shall be installed in a workmanlike manner. Reference may be made to AWI standards.
6. Paint - In general, all interior ceiling, wall, and trim surfaces shall receive renewed coatings of paint (or other clear/stain) finishes. Painting shall be done in a workmanlike manner, and in accordance with the manufacturer's recommendations. All painting including preparation of existing surfaces shall be done in a lead-safe manner (See also Section XI N.1.b-Special Construction).

K. SPECIALTIES

1. Toilet accessories – each bath will have appropriate accessories such as towel bars, robe hooks, bath tissue holders, etc., installed and securely fastened in place. Accessories shall be located per accessibility requirements where necessary.
2. Medicine cabinets and mirrors – install in each apartment bath as appropriate.
3. Signage and identification – building signage shall be provided as appropriate:
 - a. Including building address 911 #'s, apartments' identification, building directory, exits, stairways, common and utility spaces, etc. shall be in conformance with NFPA 101 Life Safety Code, and be accessibility compliant and 911 approved.
4. Exit signage will be provided as required by code and be accessibility compliant as required.
5. Fire protection specialties – provide fire extinguishers in buildings, and in apartments as required by code and/or by state or local fire authorities. Locate as directed by authorities.
6. Shelving – provide durable, cleanable shelving for pantries, linen closets, clothes closets and other storage as appropriate, securely fastened in place.

L. EQUIPMENT

1. All new equipment to be Energy Star® rated.
2. Existing equipment to be retained and continued to be used shall be in serviceable condition with an expected useful life of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
3. Equipment shall conform to the NDED's Minimum Standards for Rehabilitation.
4. Kitchen appliances –
 - a. provide new, full-size (30", 4 burner) stove and refrigerator in each apartment.
 - b. Existing appliances to be reused shall be in good and serviceable condition.
 - c. Provide other appliances (such as microwaves) as may be appropriate to the project.
 - d. All appliances in accessible apartment units shall be accessibility compliant, and located in an arrangement providing required clear floor spaces.
5. Laundries –where adequate space is available and when appropriate to meet the project goals, washers and dryers may be provided in laundry rooms or in apartments.
 - a. Heat pump dryers are encouraged where appropriate and readily available.
 - b. Where a project is served by natural gas, consideration of the use of natural gas dryers is encouraged. In projects not served by natural gas, propane fired dryers should be considered for cost of operation reasons where feasible and appropriate.
6. Solid waste handling-As appropriate, provide trash and recycling receptacles as appropriate to enable the tenants and property management staff to handle and store solid waste in order to utilize appropriate recycling practices, when feasible.
7. Playground equipment – Provide safe, code-approved new playground equipment if a playground is appropriate.

M. FURNISHINGS - CASEWORK

1. Kitchen cabinetry and counters
 - a. Existing cabinetry and/or countertops proposed to remain shall be in good condition with a remaining useful life of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.

- b. New cabinetry
 - i. Shall be of good quality, meeting ANSI/KCMA A161.1-2012 “Performance & Construction Standards for Kitchen Cabinetry and Bath Vanities” standards. Other industry standards for cabinetry may be used as guidelines, such as the Kitchen Cabinet Manufacturer’s Association (KCMA) “Severe Use Specification – 2014,” the Architectural Woodwork Institute’s (AWI) Woodwork Standards and Cabinet Fabrication Handbook.
 - ii. New counters shall be provided with a cleanable sanitary surface material impervious to water such as high pressure laminate (HPL).
 - Shop fabricated as one-piece assembly where possible. Seal field joints.
 - Installed level and securely fastened to cabinetry.
- 2. Bath cabinetry and counters – vanity lavatory tops, when used, should be one-piece integral bowl with integral backsplash.

N. SPECIAL CONSTRUCTION

- 1. Hazardous materials and remediation – see NDED’s Minimum Standards for Rehabilitation:
 - a. Asbestos – project will be assessed for the existence of asbestos-containing building materials by qualified professionals:
 - i. National Emission Standards for Hazardous Air Pollutants (NESHAP) apply.
 - ii. Removal of asbestos shall be carried out per Federal EPA and State regulations and rules.
 - b. Lead - Health and Safety and Lead Safe Housing:
 - i. All scopes of work performed pursuant to this rehabilitation standard shall support the maintenance of project compliance as required under 24 CFR Part 35.
 - ii. Lead-Based Paint
 - Federal and state regulations related to lead-based paint apply to target housing, which is defined as any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless a child of less than 6 years of age resides or is expected to reside in such housing for the elderly or persons with disabilities) or any zero-bedroom dwelling. Rehabilitation of target housing must be completed in a manner which insures the health and safety of workers and residents, especially children. A number of regulations apply when lead painted surfaces are disturbed in residential properties, primarily requiring the appropriate training of workers and the use of safe work practices. In some cases, use of federal funds for rehabilitation will trigger a higher level of lead paint treatments based on the amount of federal money being used. The following regulations must be adhered to during all rehabilitation of target housing:
 - Federal Regulations:
 - HUD Lead Safe Housing Rule (Title 24, Part 35) requires various levels of evaluation and treatment of lead paint hazards when federal money is used for rehabilitation of target housing. More information is available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/enforcement/lshr
 - EPA Renovation Repair and Painting Rule (40 CFR Part 745) – Requires

contractors conducting renovation, repair or maintenance that disturbs paint in target housing or child-occupied facilities to be licensed by EPA and use lead-safe work practices to complete the work. Developers must ensure contractors are properly trained and licensed. More information is available at: <http://www2.epa.gov/lead>

- HUD/EPA Disclosure Regulations (Title 24, Part 35, Subpart A) – Requires owners of target housing to disclose all lead paint records and related information to potential buyers and/or tenants. More information is available at:
http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12347.pdf
- OSHA Lead in Construction Rule (29 CFR Part 1926.62) - Proscribes personal protection measures to be taken when workers are exposed to any lead during construction projects. More information is available at:
<https://www.osha.gov>

Nebraska Regulations Title 178 Nebraska Administrative Code (NAC) Chapter 23:

- Nebraska law requires all work that disturbs paint in target housing to be completed using lead safe work practices. Rehabilitation completed in accordance with federal regulations described above will generally fulfill this requirement. Nebraska law includes the implementation of the Residential Lead-based Paint Professions Certification Act and the Uniform Licensing Law, as applicable.
- Nebraska law also requires conformance with Neb. Rev. Stat. §71-2518 lead poisoning prevention program and Neb. Rev. Stat. §§71-6318-71-6331.01 related to the Residential Lead-Based Paint Professions Practice Act.
- Any questions regarding compliance with lead paint regulations should be directed to the Nebraska Department of Health and Human Services, Public Health Division, Lead-Based Paint Program at 402-471-0549 or at:
<http://dhhs.ne.gov/publichealth/Pages/LeadContact.aspx>

O. CONVEYANCE SYSTEMS

1. Elevators may be installed when appropriate and possible, when such elevator is part of the project's program goals, or as required by code, as follows:
 - a. Installed per code NFPA 101, Chapter 9.4
 - b. ASME 17.1 Safety Code for Elevators – 2013
 - c. Nebraska Elevator Safety Rules
2. Existing elevators and lifts may be retained if they are appropriate to the use of the building and in serviceable condition with an expected useful life of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period, and approved by agencies having jurisdiction.

P. MECHANICAL

1. General:

- a. All mechanical systems shall be designed by a mechanical engineer or other qualified professional.
- b. Energy efficiency:
 - i. Nebraska Uniform Energy Efficiency Standards, §§81-1608 to 81-1626, Reissue Revised Statutes of Nebraska (2011).
 - ii. As outlined in the HTF Standards, all projects will either achieve the target energy efficiency objectives of the standard or present NDED with an operational case for project sustainability pursuant to the financial structure of the project.
 - iii. In both the design and implementation of project rehabilitation scopes of work, particular emphasis should be made to maximize the effectiveness of the energy efficiency related work scopes.
- c. All mechanical systems shall meet all applicable codes:
 - i. Nebraska State Fire Code Regulations, Title 153 & NFPA 101 Life Safety Code, 2012 Edition
 - ii. International Plumbing Code – 2012 & Nebraska Uniform Plumbing Code (UPC), 2009, per LB 42, 2012
 - iii. Nebraska Energy Codes as they may apply:
 - Nebraska Residential Building Energy Standards (NBES) for buildings of three stories or less; and/or
 - Nebraska Commercial Building Energy Standards (NBES) for buildings of 4 stories or more, and some mixed-use buildings.
 - iv. Plumbing fixtures will be accessibility compliant as required
 - v. State and local Fire & Building Codes, as applicable.

2. Fire protection

- a. In general, all buildings assisted with HTF funds shall have fire suppression as required by applicable codes with approved sprinkler systems installed as required by NFPA 101 and NFPA 1, and approved by the Nebraska State Fire Marshal:
 - i. System design to conform to applicable NFPA standard 13 or 13R
 - ii. System calculations and design shall be done by a person holding a NICET Level III certification or a Water-Based Fire Protection System Contractor approved by certification with the Nebraska State Fire Marshal.
 - iii. System installed by State approved persons holding appropriate TQP certificates.
 - iv. Underground water services for sprinkler system shall meet NFPA 24
 - v. Provide fire pumps, standpipes, and fire department connection as required per NFPA 13, 14 & 25.
- b. Where possible, piping for the sprinkler system shall be concealed.

3. Plumbing

- a. Where existing components of a system are to be reused, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period. Substandard or critical non-code compliant components shall be replaced.

- b. Use water-saving shower heads and faucet aerators as required and applicable.
 - c. All fixtures, piping fittings and equipment shall be lead-free in accordance with the Nebraska Plumbing Rules.
 - d. Kitchen fixtures – When existing kitchen fixtures are not reused in accordance with P.3.a. above, new sinks and faucets, and associated plumbing shall be installed in each apartment.
 - e. Bath fixtures – When existing bath fixtures are not reused in accordance with P.3.a. above, new water saving toilets, tubs and tub surrounds, lavatory sinks, and faucets shall be installed in each apartment.
 - i. Three and four-bedroom apartments are encouraged to be designed to include 1½ baths minimum where adequate space is available.
 - f. Provision for laundry rooms or laundry hook-ups may be made per project’s program requirements.
 - g. Provision for other utility plumbing for janitor sinks, floor drains, outdoor faucets, drains for dehumidification systems, etc., may be made as desired or required.
4. Heating
- a. System design:
 - i. Must comply with NDED’s Minimum Rehabilitation Standards.
 - ii. Where existing components of a system are proposed to be reused, they will be examined and determined to be in good and serviceable condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period.
 - b. Temperature control - The temperature in each apartment shall be individually thermostatically controlled.
 - c. Provide adequate heat in common spaces.
 - d. Install pipe insulation with minimum 1.5” wall thickness
 - e. Minimum equipment efficiencies per applicable Nebraska Department of Energy requirements
 - f. Motors and pumps – high efficiency Brushless Permanent Magnet Pumps (BLPM) with variable frequency drives (VFD) per state and local requirements.
 - g. Control wiring and control strategies per state and local requirements with outdoor temperature reset.
 - h. Finned Tube Radiation – where used - high output heavy gauge enclosure baseboard finned tube radiation is recommended to provide a more durable product with a longer expected useful life. Replace existing as appropriate.
5. Ventilation
- a. Code-compliant indoor air quality will be addressed by the installation of either exhaust only or balanced (heat recovery) ventilation systems as required by:
 - i. Fire protection of system ducts per NFPA 101, Chapter 9.2
 - ii. ASHRAE 62.2
 - iii. REBS or CBES
 - iv. NDED Rehabilitation Standards.

- b. Balanced mechanical ventilation systems are encouraged.
- c. Ventilation controls shall be per applicable codes
- 6. Domestic Hot Water:
 - a. System shall be designed as required per code.
 - b. Install pipe insulation per code.

Q. ELECTRICAL

- 1. Project electrical design should be done by a licensed electrical engineer, or other qualified professional.
- 2. Project electrical must be installed by a licensed electrician
- 3. Energy efficiency:
 - a. Must comply with NDED's Minimum Rehabilitation Standards.
- 4. Design shall comply with all the applicable codes:
 - a. Nebraska State Fire & Building Code, Title 153
 - b. NFPA 101, Life Safety Code
 - c. NFPA 70, National Electrical Code, 2011 Edition
 - d. NFPA 72, National Fire Alarm and Signaling Code
 - e. NFPA 20, Standard for the Installation of Stationary Pumps for Fire Protection
- 5. In general, the electrical system should be new throughout a building:
 - a. Where existing service entrances, disconnects, meters, distribution wiring, panels, and devices are proposed to remain, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period. The designer, in concert with the State electrical inspector, shall examine the system and equipment. Existing components of the electrical system may be reused as appropriate. Substandard or critical non-code compliant components shall be replaced.
- 6. Utility connections shall be installed per the rules and regulations of the electrical utility.
- 7. Electrical service and metering:
 - a. The service entrance size shall be calculated to handle the proposed electrical loads.
 - b. Metering and disconnects shall be per code and mounted at approved locations.
- 8. Elevator wiring shall conform to the ANSI 17.1 as provided within the Nebraska Elevator Safety Rules.
- 9. Electrical distribution system:
 - a. Lighting and receptacle circuits shall be designed per code.
 - b. Locations and layout of devices and lighting to be logical and accessibility compliant where required.
 - c. Provision shall be made for the wiring of dedicated equipment circuits and connections for heating, ventilation equipment/exhaust fans, pumps, appliances, etc.
- 10. Artificial Lighting shall be provided using IBC 1205 as a minimum guideline.
 - a. All lighting shall be in accordance NDED's Minimum Standards for Rehabilitation and

- other state and local codes, as applicable.
- b. Developers are encouraged to upgrade to Energy Star® Category.
- 11. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
 - a. Energy efficient lighting shall meet the minimum program requirements of NDED’s Minimum Standards for Rehabilitation and other state and local codes, as applicable.
- 12. Emergency and exit lighting/illuminated signage shall be per the NFPA 101, Life Safety Code.
- 13. Fire detection and alarms:
 - a. Shall be installed as required by code: NFPA 101, Chapters 9.6, 30.3.4 and/or 31.3.4, and comply with NFPA 72, and NFPA 1.
 - b. Smoke detectors shall be installed per NFPA 30.3.4.5 and 9.6.2.10.
 - c. CO detectors shall be installed per Nebraska State Fire and Building Code and NFPA 101, Chapter 30.3.4.6 and NFPA 720.
 - d. Where required – system annunciation shall be in accordance with NFPA 1.
- 14. Communication low-voltage wiring – provisions for TV, telephone, internet data, security, and intercoms should be considered and installed as appropriate to the project’s use and livability.
- 15. PV Solar – an optional solar-powered photovoltaic panel system may be installed in accordance with the National Electrical code, State energy code, and the regulations of the governing utility.

ATTACHMENT B

HTF Rehab Standards: Uniform Physical Condition Standards for Single Family & Multifamily Housing Rehabilitation

NOTE: Deficiencies highlighted in orange are life-threatening and must be addressed immediately, if the housing is occupied.

REQUIREMENTS FOR SITE		
Inspected Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
Fencing and Gates	Damaged/Falling/Leaning	<i>Fence or gate is missing or damaged to the point it does not function as it should</i>
	Holes	<i>Hole in fence or gate is larger than 6 inches by 6 inches</i>
	Missing Sections	<i>An exterior fence, security fence or gate is missing a section which could threaten safety or security</i>
Grounds	Erosion/Rutting Areas	<i>Runoff has extensively displaced soils which has caused visible damage or potential failure to adjoining structures or threatens the safety of pedestrians or makes the grounds unusable</i>
	Overgrown/Penetrating Vegetation	<i>Vegetation has visibly damaged a component, area or system of the property or has made them unusable or unpassable</i>
	Ponding/Site Drainage	<i>There is an accumulation of more than 5 inches deep and/or a large section of the grounds-more than 20%-is unusable for it's intended purpose due to poor drainage or ponding</i>
Health & Safety	Air Quality - Sewer Odor Detected	<i>Sewer odors that could pose a health risk if inhaled for prolonged periods</i>
	Air Quality - Propane/Natural Gas/Methane Gas Detected	<i>Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled</i>
	Electrical Hazards - Exposed Wires/Open Panels	<i>Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)</i>
	Electrical Hazards - Water Leaks on/near Electrical Equipment	<i>Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion</i>
	Flammable Materials - Improperly Stored	<i>Flammable materials are improperly stored, causing the potential risk of fire or explosion</i>
	Garbage and Debris - Outdoors	<i>Too much garbage has gathered-more than the planned storage capacity, or garbage has gathered in an area not sanctioned for staging or storing garbage or debris</i>
	Hazards - Other	<i>Any general defects or hazards that pose risk of bodily injury</i>
	Hazards - Sharp Edges	<i>Any physical defect that could cause cutting or breaking of human skin or other bodily harm</i>
	Hazards - Tripping	<i>Any physical defect in walkways or other travelled area that poses a tripping risk</i>
	Infestation - Insects	<i>Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk</i>
Infestation - Rats/Mice/Vermin	<i>Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk</i>	
Mailboxes/Project Signs	Mailbox Missing/Damaged	<i>Mailbox cannot be locked or is missing</i>
	Signs Damaged	<i>The project sign is not legible or readable because of deterioration or damage</i>

Parking Lots/Driveways/Roads	Cracks	<i>Cracks that are large enough to affect traffic ability over more than 5% of the property's parking lots/driveways/roads or pose a safety hazard</i>
	Ponding	<i>3 inches or more of water has accumulated making 5% or more of a parking lot/driveway unusable or unsafe</i>
	Potholes/Loose Material	<i>Potholes or loose material that have made a parking lot/driveway unusable/unpassable for vehicles and/or pedestrians or could cause tripping or falling</i>
	Settlement/Heaving	<i>Settlement/heaving has made a parking lot/driveway unusable/unpassable or creates unsafe conditions for pedestrians and vehicles</i>
Play Areas and Equipment	Damaged/Broken Equipment	<i>More than 20% of the equipment is broken or does not operate as it should or any item that poses a safety risk</i>
	Deteriorated Play Area Surface	<i>More than 20% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk</i>
Refuse Disposal	Broken/Damaged Enclosure-Inadequate Outside Storage Space	<i>A single wall or gate of the enclosure has collapsed or is leaning and in danger of falling or trash cannot be stored in the designated area because it is too small to store refuse until disposal</i>
Retaining Walls	Damaged/Falling/Leaning	<i>A retaining wall is damaged and does not function as it should or is a safety risk</i>
Storm Drainage	Damaged/Obstructed	<i>The system is partially or fully blocked by a large quantity of debris , causing backup into adjacent areas or runoffs into areas where runoff is not intended</i>
Walkways/Steps	Broken/Missing Hand Railing	<i>The hand rail is missing, damaged, loose or otherwise unusable</i>
	Cracks/Settlement/Heaving	<i>Cracks, hinging/tilting or missing sections that affect traffic ability over more than 5% of the property's walkways/steps or any defect that creates a tripping or falling hazard</i>
	Spalling/Exposed rebar	<i>More than 5% of walkways have large areas of spalling--larger than 4 inches by 4 inches—that affects traffic ability</i>

REQUIREMENTS FOR BUILDING EXTERIOR

Inspected Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
Doors	Damaged Frames/Threshold/Lintels/Trim	<i>Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim</i>
	Damaged Hardware/Locks	<i>Any door that does not function as it should or cannot be locked because of damage to the door's hardware</i>
	Damaged Surface (Holes/Paint/Rusting/Glass)	<i>Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass</i>
	Damaged/Missing Screen/Storm/Security Door	<i>Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing</i>
	Deteriorated/Missing Caulking/Seals	<i>The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should</i>

	Missing Door	<i>Any exterior door that is missing</i>
Fire Escapes	Blocked Egress/Ladders	<i>Stored items or other barriers restrict or block people from exiting</i>
	Visibly Missing Components	<i>Any of the functional components that affect the function of the fire escape--one section of a ladder or railing, for example--are missing</i>
Foundations	Cracks/Gaps	<i>Large cracks in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of wall or floor that are broken apart</i>
	Spalling/Exposed Rebar	<i>Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material--rebar or other</i>
Health and Safety	Electrical Hazards - Exposed Wires/Open Panels	<i>Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)</i>
	Electrical Hazards - Water Leaks on/near Electrical Equipment	<i>Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion</i>
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	<i>The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit</i>
	Emergency Fire Exits - Missing Exit Signs	<i>Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign</i>
	Flammable/Combustible Materials - Improperly Stored	<i>Flammable materials are improperly stored, causing the potential risk of fire or explosion</i>
	Garbage and Debris - Outdoors	<i>Too much garbage has gathered--more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris</i>
	Hazards - Other	<i>Any general defects or hazards that pose risk of bodily injury</i>
	Hazards - Sharp Edges	<i>Any physical defect that could cause cutting or breaking of human skin or other bodily harm</i>
	Hazards - Tripping	<i>Any physical defect in walkways or other travelled area that poses a tripping risk</i>
	Infestation - Insects	<i>Evidence of infestation of insects--including roaches and ants--throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk</i>
	Infestation - Rats/Mice/Vermin	<i>Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk</i>
Lighting	Broken Fixtures/Bulbs	<i>10% or more of the lighting fixtures and bulbs surveyed are broken or missing</i>
Roofs	Damaged Soffits/Fascia	<i>Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible</i>
	Damaged Vents	<i>Vents are missing or so visibly damaged that further roof damage is possible</i>
	Damaged/Clogged Drains	<i>The drain is damaged or partially clogged with debris or the drain no longer functions</i>
	Damaged/Torn Membrane/Missing Ballast	<i>Ballast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration</i>
	Missing/Damaged Components from Downspout/Gutter	<i>Drainage system components are missing or damaged causing visible damage to the roof, structure, exterior wall surface, or interior</i>

	Missing/Damaged Shingles	<i>Roofing shingles are missing or damaged enough to create a risk of water penetration</i>
	Ponding	<i>Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials</i>
Walls	Cracks/Gaps	<i>Any large crack or gap that is more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration</i>
	Damaged Chimneys	<i>Part or all of the chimney has visibly separated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create a safety hazard</i>
	Missing/Damaged Caulking/Mortar	<i>Any exterior wall caulking or mortar deterioration that presents a risk of water penetration or risk of structural damage</i>
	Missing Pieces/Holes/Spalling	<i>Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage</i>
	Stained/Peeling/Needs Paint	<i>More than 20% of the exterior paint is peeling or paint is missing and siding surface is exposed thereby exposing siding to water penetration and deterioration</i>
Windows	Broken/Missing/Cracked Panes	<i>Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane</i>
	Damaged Sills/Frames/Lintels/Trim	<i>Sills, frames, lintels, or trim are missing or damaged, exposing the inside of the surrounding walls and compromising its weather tightness</i>
	Damaged/Missing Screens	<i>Missing screens or screens with holes greater than 1 inch by 1 inch or tears greater than 2 inches in length</i>
	Missing/Deteriorated Caulking/Seals/Glazing Compound	<i>There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure</i>
	Peeling/Needs Paint	<i>More than 20% of the exterior window paint is peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration</i>
	Security Bars Prevent Egress	<i>The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks</i>

REQUIREMENTS FOR BUILDING SYSTEMS

Inspected Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
Domestic Water	Leaking Central Water Supply	<i>Leaking water from water supply line is observed</i>
	Missing Pressure Relief Valve	<i>There is no pressure relief valve or pressure relief valve does not drain down to the floor</i>
	Rust/Corrosion on Heater Chimney	<i>The water heater chimney shows evidence of flaking, discoloration, pitting, or crevices that may create holes that could allow toxic gases to leak from the chimney</i>
	Water Supply Inoperable	<i>There is no running water in any area of the building where there should be</i>
Electrical System	Blocked Access/Improper Storage	<i>One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency</i>
	Burnt Breakers	<i>Carbon residue, melted breakers or arcing scars are evident</i>

	Evidence of Leaks/Corrosion	<i>Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures, or any evidence of water leaks in the enclosure or hardware</i>
	Frayed Wiring	<i>Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire</i>
	Missing Breakers/Fuses	<i>Any open and/or exposed breaker port</i>
	Missing Outlet Covers	<i>A cover is missing, which results in exposed visible electrical connections</i>
Elevators	Not Operable	<i>The elevator does not function at all or the elevator doors open when the cab is not there</i>
Emergency Power	Auxiliary Lighting Inoperable (if applicable)	<i>Auxiliary lighting does not function</i>
Fire Protection	Missing Sprinkler Head	<i>Any sprinkler head is missing, visibly disabled, painted over, blocked, or capped</i>
	Missing/Damaged/Expired Extinguishers	<i>There is missing, damaged or expired fire extinguisher an any area of the building where a fire extinguisher is required</i>
Health & Safety	Air Quality - Mold and/or Mildew Observed	<i>Evidence of mold or mildew is observed that is substantial enough to pose a health risk</i>
	Air Quality - Propane/Natural Gas/Methane Gas Detected	<i>Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled</i>
	Air Quality - Sewer Odor Detected	<i>Sewer odors that could pose a health risk if inhaled for prolonged periods</i>
	Electrical Hazards - Exposed Wires/Open Panels	<i>Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)</i>
	Electrical Hazards - Water Leaks on/near Electrical Equipment	<i>Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion</i>
	Elevator - Tripping	<i>An elevator is misaligned with the floor by more than 3/4 of an inch. The elevator does not level as it should, which causes a tripping hazard</i>
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	<i>The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit</i>
	Emergency Fire Exits - Missing Exit Signs	<i>Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign</i>
	Flammable Materials - Improperly Stored	<i>Flammable materials are improperly stored, causing the potential risk of fire or explosion</i>
	Garbage and Debris - Indoors	<i>Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris</i>
	Hazards - Other	<i>Any general defects or hazards that pose risk of bodily injury</i>
	Hazards - Sharp Edges	<i>Any physical defect that could cause cutting or breaking of human skin or other bodily harm</i>
	Hazards - Tripping Hazards	<i>Any physical defect in walkways or other travelled area that poses a tripping risk</i>
	Infestation - Insects	<i>Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk</i>
	Infestation - Rats/Mice/Vermin	<i>Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk</i>
HVAC	Boiler/Pump Leaks	<i>Evidence of water or steam leaking in piping or pump packing</i>

	Fuel Supply Leaks	<i>Evidence of any amount of fuel leaking from the supply tank or piping</i>
	General Rust/Corrosion	<i>Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticeable pit or crevice</i>
	Misaligned Chimney/Ventilation System	<i>A misalignment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous venting of gases</i>
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable	<i>The roof exhaust fan unit does not function</i>
Sanitary System	Broken/Leaking/Clogged Pipes or Drains	<i>Evidence of active leaks in or around the system components or evidence of standing water, puddles or ponding--a sign of leaks or clogged drains</i>
	Missing Drain/Cleanout/Manhole Covers	<i>A protective cover is missing</i>

REQUIREMENTS FOR COMMON AREAS

Inspected Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
Basement/Garage/Carpport	Baluster/Side Railings - Damaged	<i>Any damaged or missing balusters or side rails that limit the safe use of an area</i>
Closet/Utility/Mechanical	Cabinets - Missing/Damaged	<i>10% or more of cabinet, doors, or shelves are missing or the laminate is separating</i>
Community Room	Call for Aid - Inoperable	<i>The system does not function as it should</i>
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks	<i>Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 11 inches long</i>
Kitchen	Ceiling - Peeling/Needs Paint	<i>More than 10% of ceiling has peeling paint or is missing paint</i>
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew	<i>Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 foot square</i>
Lobby	Countertops - Missing/Damaged	<i>10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate ---not a sanitary surface to prepare food</i>
Office	Dishwasher/Garbage Disposal - Inoperable	<i>The dishwasher or garbage disposal does not operate as it should</i>
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim	<i>Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim</i>
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks	<i>Any door that does not function as it should or cannot be locked because of damage to the door's hardware</i>
Restrooms	Doors - Damaged Surface (Holes/Paint/Rust/Glass)	<i>Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass</i>

Storage	Doors - Damaged/Missing Screen/Storm/Security Door	<i>Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing</i>
	Doors - Deteriorated/Missing Seals (Entry Only)	<i>The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should</i>
	Doors - Missing Door	<i>Any door that is missing that is required for the functional use of the space</i>
	Dryer Vent -Missing/Damaged/Inoperable	<i>The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside</i>
	Electrical - Blocked Access to Electrical Panel	<i>One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency</i>
	Electrical - Burnt Breakers	<i>Carbon residue, melted breakers or arcing scars are evident</i>
	Electrical - Evidence of Leaks/Corrosion	<i>Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware</i>
	Electrical - Frayed Wiring	<i>Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire</i>
	Electrical - Missing Breakers	<i>Any open and/or exposed breaker port</i>
	Electrical - Missing Covers	<i>A cover is missing, which results in exposed visible electrical connections</i>
	Floors - Bulging/Buckling	<i>Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types</i>
	Floors - Floor Covering Damaged	<i>More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.</i>
	Floors - Missing Floor/Tiles	<i>More than 5% of the flooring or tile flooring is missing</i>
	Floors - Peeling/Needs Paint	<i>Any painted flooring that has peeling or missing paint on more than 10% of the surface</i>
	Floors - Rot/Deteriorated Subfloor	<i>Any rotted or deteriorated subflooring greater than 6 inches by 6 inches</i>
	Floors - Water Stains/Water Damage/Mold/Mildew	<i>Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 foot square</i>
	GFI - Inoperable	<i>The GFI does not function</i>
	Graffiti	<i>Any graffiti on any exposed surface greater than 6 inches by 6 inches</i>
	HVAC - Convection/Radiant Heat System Covers Missing/Damaged	<i>Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans</i>
	HVAC - General Rust/Corrosion	<i>Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice</i>
	HVAC - Inoperable	<i>HVAC does not function. It does not provide the heating and cooling as it should. The system does not respond when the controls are engaged</i>
	HVAC - Misaligned Chimney/Ventilation System	<i>Any misalignment that may cause improper or dangerous venting of gases</i>
	HVAC - Noisy/Vibrating/Leaking	<i>HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged</i>
	Lavatory Sink - Damaged/Missing	<i>Sink has extensive discoloration or cracks in over 50% of the basin or the sink or associated hardware have failed or are missing and the sink can't be used</i>

Lighting - Missing/Damaged/Inoperable Fixture	<i>More than 10% of the permanent lighting fixtures are missing or damaged so they do not function</i>
Mailbox - Missing/Damaged	<i>The U.S. Postal Service mailbox cannot be locked or is missing</i>
Outlets/Switches/Cover Plates - Missing/Broken	<i>Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring</i>
Pedestrian/Wheelchair Ramp	<i>A walkway or ramp is damaged and cannot be used by people on foot, in wheelchair, or using walkers</i>
Plumbing - Clogged Drains	<i>Drain is substantially or completely clogged or has suffered extensive deterioration</i>
Plumbing - Leaking Faucet/Pipes	<i>A steady leak that is adversely affecting the surrounding area</i>
Range Hood /Exhaust Fans - Excessive Grease/Inoperable	<i>A substantial accumulation of dirt or grease that threatens the free passage of air</i>
Range/Stove - Missing/Damaged/Inoperable	<i>One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning</i>
Refrigerator - Damaged/Inoperable	<i>The refrigerator has an extensive accumulation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance</i>
Restroom Cabinet - Damaged/Missing	<i>Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose</i>
Shower/Tub - Damaged/Missing	<i>Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing</i>
Sink - Missing/Damaged	<i>Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing</i>
Smoke Detector - Missing/Inoperable	<i>Smoke detector is missing or does not function as it should</i>
Stairs - Broken/Damaged/Missing Steps	<i>A step is missing or broken</i>
Stairs - Broken/Missing Hand Railing	<i>The hand rail is missing, damaged, loose or otherwise unusable</i>
Ventilation/Exhaust System - Inoperable	<i>exhaust fan is not functioning or window designed for ventilation does not open</i>
Walls - Bulging/Buckling	<i>Bulging, buckling or sagging walls or a lack of horizontal alignment</i>
Walls - Damaged	<i>Any hole in wall greater than 2 inches by 2 inches</i>
Walls - Damaged/Deteriorated Trim	<i>10% or more of the wall trim is damaged</i>
Walls - Peeling/Needs Paint	<i>10% or more of interior wall paint is peeling or missing</i>
Walls - Water Stains/Water Damage/Mold/Mildew	<i>Evidence of a leak, mold or mildew--such as a common area--covering a wall area greater than 1 foot square</i>
Water Closet/Toilet - Damaged/Clogged/Missing	<i>Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed</i>
Windows - Cracked/Broken/Missing Panes	<i>Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane</i>
Windows - Damaged Window Sill	<i>The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness</i>

	Windows - Inoperable/Not Lockable	<i>Any window that is not functioning or cannot be secured because lock is broken</i>
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound	<i>There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure</i>
	Windows - Peeling/Needs Paint	<i>More than 10% of interior window paint is peeling or missing</i>
	Windows - Security Bars Prevent Egress	<i>The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks</i>
Health & Safety	Air Quality - Mold and/or Mildew Observed	<i>Evidence of mold or mildew is observed that is substantial enough to pose a health risk</i>
	Air Quality - Propane/Natural Gas/Methane Gas Detected	<i>Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled</i>
	Air Quality - Sewer Odor Detected	<i>Sewer odors that could pose a health risk if inhaled for prolonged periods</i>
	Electrical Hazards - Exposed Wires/Open Panels	<i>Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)</i>
	Electrical Hazards - Water Leaks on/near Electrical Equipment	<i>Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion</i>
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	<i>The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit</i>
	Emergency Fire Exits - Missing Exit Signs	<i>Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign</i>
	Flammable/Combustible Materials - Improperly Stored	<i>Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion</i>
	Garbage and Debris - Indoors	<i>Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris</i>
	Garbage and Debris - Outdoors	<i>Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris</i>
	Hazards - Other	<i>Any general defects or hazards that pose risk of bodily injury</i>
	Hazards - Sharp Edges	<i>Any physical defect that could cause cutting or breaking of human skin or other bodily harm</i>
	Hazards - Tripping	<i>Any physical defect in walkways or other travelled area that poses a tripping risk</i>
	Infestation - Insects	<i>Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk</i>
	Infestation - Rats/Mice/Vermin	<i>Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk</i>
Pools and Related Structures	Fencing - Damaged/Not Intact	<i>Any damage that could compromise the integrity of the fence</i>
Trash Collection Areas	Chutes - Damaged/Missing Components	<i>Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or components--chute, chute door, and other components--have failed</i>

REQUIREMENTS FOR UNIT

Inspected Item	Observable Deficiency	
Bathroom	Bathroom Cabinets - Damaged/Missing	<i>Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose</i>
	Lavatory Sink - Damaged/Missing	<i>Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing</i>
	Plumbing - Clogged Drains, Faucets	<i>Drain or faucet is substantially or completely clogged or has suffered extensive deterioration</i>
	Plumbing - Leaking Faucet/Pipes	<i>A steady leak that is adversely affecting the surrounding area</i>
	Shower/Tub - Damaged/Missing	<i>Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing</i>
	Ventilation/Exhaust System - Absent/Inoperable	<i>exhaust fan is not functioning or window designed for ventilation does not open</i>
	Water Closet/Toilet - Damaged/Clogged/Missing	<i>Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed</i>
Call-for-Aid (if applicable)	Inoperable	<i>The system does not function as it should</i>
Ceiling	Bulging/Buckling/Leaking	<i>Bulging, buckling or sagging ceiling or problem with alignment</i>
	Holes/Missing Tiles/Panels/Cracks	<i>Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long</i>
	Peeling/Needs Paint	<i>More than 10% of ceiling has peeling paint or is missing paint</i>
	Water Stains/Water Damage/Mold/Mildew	<i>Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 foot square</i>
Doors	Damaged Frames/Threshold/Lintels/Trim	<i>Any door that is not functioning or cannot be locked because of damage to the frame,</i>
	Damaged Hardware/Locks	<i>Any door that does not function as it should or cannot be locked because of damage to the</i>
	Damaged/Missing Screen/Storm/Security	<i>Any screen door or storm door that is damaged or is missing screens or glass--shown by an</i>
	Damaged Surface -	<i>Any door that has a hole or holes greater than 1 inch in diameter, significant</i>
	Deteriorated/Missing Seals (Entry Only)	<i>The seals/caulking is missing on any entry door, or they are so damaged that they do not</i>
	Missing Door	<i>Any door that is required for security (entry) or privacy (Bathroom) that is missing or any</i>
Electrical System	Blocked Access to Electrical Panel	<i>One or more fixed items or items of sufficient size and weight impede access to the building</i>
	Burnt Breakers	<i>Carbon residue, melted breakers or arcing scars are evident</i>
	Evidence of Leaks/Corrosion	<i>Any corrosion that affects the condition of the components that carry current or any stains or</i>
	Frayed Wiring	<i>Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire</i>
	GFI - Inoperable	<i>The GFI does not function</i>
	Missing Breakers/Fuses	<i>Any open and/or exposed breaker port</i>
	Missing Covers	<i>A cover is missing, which results in exposed visible electrical connections</i>
Floors	Bulging/Buckling	<i>Any flooring that is bulging, buckling or sagging or a problem with alignment between</i>
	Floor Covering Damage	<i>More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears,</i>
	Missing Flooring Tiles	<i>Any flooring or tile flooring that is missing</i>

	Peeling/Needs Paint	<i>Any painted flooring that has peeling or missing paint on more than 10% of the surface</i>
	Rot/Deteriorated Subfloor	<i>Any rotted or deteriorated subflooring greater than 6 inches by 6 inches</i>
	Water Stains/Water Damage/Mold/Mildew	<i>Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area</i>
Health & Safety	Air Quality - Mold and/or Mildew Observed	<i>Evidence of mold or mildew is observed that is substantial enough to pose a health risk</i>
	Air Quality - Sewer Odor Detected	<i>Sewer odors that could pose a health risk if inhaled for prolonged periods</i>
	Air Quality - Propane/Natural Gas/Methane	<i>Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire</i>
	Electrical Hazards - Exposed Wires/Open	<i>Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)</i>
	Electrical Hazards - Water Leaks on/near	<i>Any water leaking, puddling or ponding on or immediately near any electrical apparatus</i>
	Emergency Fire Exits - Emergency/Fire Exits	<i>The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is</i>
	Emergency Fire Exits - Missing Exit Signs	<i>Exit signs that clearly identify all emergency exits are missing or there is no illumination in</i>
	Flammable Materials - Improperly Stored	<i>Flammable materials are improperly stored, causing the potential risk of fire or explosion</i>
	Garbage and Debris - Indoors	<i>Too much garbage has gathered-more than the planned storage capacity or garbage has</i>
	Garbage and Debris - Outdoors	<i>Too much garbage has gathered-more than the planned storage capacity or garbage has</i>
	Hazards - Other	<i>Any general defects or hazards that pose risk of bodily injury</i>
	Hazards - Sharp Edges	<i>Any physical defect that could cause cutting or breaking of human skin or other bodily harm</i>
	Hazards - Tripping	<i>Any physical defect in walkways or other travelled area that poses a tripping risk</i>
Infestation - Insects	<i>Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food</i>	
Infestation - Rats/Mice/Vermin	<i>Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to</i>	
Hot Water Heater	Misaligned Chimney/Ventilation System	<i>Any misalignment that may cause improper or dangerous venting of gases</i>
	Inoperable Unit/Components	<i>Hot water from hot water taps is no warmer than room temperature indicating hot water</i>
	Leaking Valves/Tanks/Pipes	<i>There is evidence of active water leaks from hot water heater or related components</i>
	Pressure Relief Valve Missing	<i>There is no pressure relief valve or pressure relief valve does not drain down to the floor</i>
	Rust/Corrosion	<i>Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice</i>
HVAC System	Convection/Radiant Heat System Covers	<i>Cover is missing or substantially damaged, allowing contact with heating/surface elements</i>
	Inoperable	<i>HVAC does not function. It does not provide the heating and cooling, as it should. The system</i>
	Misaligned Chimney/Ventilation System	<i>Any misalignment that may cause improper or dangerous venting of gases</i>
	Noisy/Vibrating/Leaking	<i>The HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged</i>
	Rust/Corrosion	<i>Deterioration from rust or corrosion on the HVAC system in the dwelling unit</i>
Kitchen	Cabinets - Missing/Damaged	<i>10% or more of cabinet, doors, or shelves are missing or the laminate is separating</i>
	Countertops - Missing/Damaged	<i>10% or more of the countertop working surface is missing, deteriorated, or damaged below</i>
	Dishwasher/Garbage Disposal - Inoperable	<i>The dishwasher or garbage disposal does not operate as it should</i>
	Plumbing - Clogged Drains	<i>Drain is substantially or completely clogged or has suffered extensive deterioration</i>
	Plumbing - Leaking Faucet/Pipes	<i>A steady leak that is adversely affecting the surrounding area</i>
	Range Hood/Exhaust Fans - Excessive	<i>A substantial accumulation of dirt or grease that threatens the free passage of air</i>
	Range/Stove - Missing/Damaged/Inoperable	<i>One or more burners are not functioning or doors or drawers are impeded or on gas ranges</i>
	Refrigerator-Missing/Damaged/Inoperable	<i>The refrigerator has an extensive accumulation of ice or the seals around the doors are</i>
	Sink - Damaged/Missing	<i>Any cracks in sink through which water can pass or extensive discoloration over more than</i>

Laundry Area	Dryer Vent - Missing/Damaged/Inoperable	<i>The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not</i>
Lighting	Missing/Inoperable Fixture	<i>A permanent light fixture is missing or not functioning, and no other switched light source is</i>
Outlets/Switches	Missing	<i>An outlet or switch is missing</i>
	Missing/Broken Cover Plates	<i>An outlet or switch has a broken cover plate over a junction box or the cover plate is missing</i>
Patio/Porch/Balcony	Baluster/Side Railings Damaged	<i>Any damaged or missing balusters or side rails that limit the safe use of an area</i>
Smoke Detector	Missing/Inoperable	<i>Smoke detector is missing or does not function as it should</i>
Stairs	Broken/Damaged/Missing Steps	<i>A step is missing or broken</i>
	Broken/Missing Hand Railing	<i>The hand rail is missing, damaged, loose or otherwise unusable</i>
Walls	Bulging/Buckling	<i>Bulging, buckling or sagging walls or a lack of horizontal alignment</i>
	Damaged	<i>Any hole in wall greater than 2 inches by 2 inches</i>
	Damaged/Deteriorated Trim	<i>10% or more of the wall trim is damaged</i>
	Peeling/Needs Paint	<i>10% or more of interior wall paint is peeling or missing</i>
	Water Stains/Water Damage/Mold/Mildew	<i>Evidence of a leak, mold or mildew covering a wall area greater than 1 foot square</i>
Windows	Cracked/Broken/Missing Panes	<i>Any missing panes of glass or cracked panes of glass where the crack is either greater than</i>
	Damaged Window Sill	<i>The sill is damaged enough to expose the inside of the surrounding walls and compromise its</i>
	Missing/Deteriorated Caulking/Seals/Glazing	<i>There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the</i>
	Inoperable/Not Lockable	<i>Any window that is not functioning or cannot be secured because lock is broken</i>
	Peeling/Needs Paint	<i>More than 10% of interior window paint is peeling or missing</i>
	Security Bars Prevent Egress	<i>The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks</i>

ATTACHMENT C

MINIMUM REHABILITATION STANDARDS | SINGLE-FAMILY & MULTI-FAMILY REHABILITATION

[NOTE: The below mentioned rehabilitation standards, as adopted by the Department, may be used for HTF projects, as applicable, and are incorporated by reference into the Nebraska DED HTF Rehabilitation Standards. Any discrepancy between Nebraska’s HTF Rehabilitation Standards and the general NDED Rehabilitation Standards, the Nebraska HTF standards will preempt].

A. MINIMUM STRUCTURAL STANDARDS

1. SIDEWALKS, STAIRS, DRIVEWAYS, PARKING LOTS, ROADS – All sidewalks, driveways, parking lots, roads, stairs and similar areas shall be free of hazardous conditions and in proper repair.

Other Inspectable Items: Cracks
Settlement / Heaving
Spalling / Exposed Rebar
Potholes / Loose Material
Hand-railing-Broken / Missing

2. PREMISE IDENTIFICATION NUMBERS – Address numbers easily visible and legible from the street or road shall be installed. Numbers shall contrast in color with their background and be at least 4 inches high with a minimum stroke width of one half inch.

Other Inspectable Items: Mailbox – Missing / Damaged
Signs / Numbers – Missing / Damaged

3. FOUNDATIONS, EXTERIOR WALLS, ROOFS, SOFFITS AND FASCIA – Every foundation, exterior wall, roof, soffit, and fascia shall be structurally sound, weather-tight, and rodent/insect-proof.

All exterior surface materials shall be protected by lead-free paint or other protective coating in accordance with acceptable standards. The exception is all types of exterior materials acceptable to weatherizing without deterioration.

Other Inspectable Items: Foundations:
Cracks / Gaps
Spalling / Exposed Rebar

Walls:
Cracks / Gaps
Damaged Chimneys
Missing / Damaged Caulking / Mortar
Missing Pieces / Holes / Spalling

Stained / Peeling / Needs Paint

Roofs:

Damaged Soffits / Fascia
Damaged Vents
Damaged / Clogged Drains
Damaged / Torn Membrane / Missing Ballast
Missing / Damaged Components from Downspout / Gutter
Missing / Damaged Shingles
Ponding

Roof Exhaust System:

Roof Exhaust Fan(s) Inoperable

Windows:

Broken / Missing / Cracked Panes
Damaged Sills / Frames / Lintels / Trim
Damaged / Missing Screens
Missing / Deteriorated Caulking / Seals / Glazing Compound
Peeling / Needs Paint
Security Bars Prevent Egress

Lighting:

Broken Fixtures / Bulbs

4. INTERIOR WALLS, FLOORS, CEILINGS, DOORS, AND WINDOWS – Every interior partition, wall floor, ceiling, door and window shall be structurally sound.

Holes in walls should be re-plastered before new paint is applied.

All interior doors shall be capable of affording privacy for which they were intended.

Other Inspectable Items: Walls and Ceiling:

Bulging / Buckling
Holes / Missing Tiles / Panels / Cracks
Peeling / Needs Paint
Water Stains / Water Damage / Mold / Mildew
Damaged / Deteriorated Trim

Floors:

Bulging/Buckling
Floor Covering Damage

Missing Flooring Tiles
Peeling / Needs Paint
Rot / Deteriorated Subfloor
Water Stains / Water Damage / Mold / Mildew

Doors:

Damaged Frames / Threshold / Lintels / Trim
Damaged Hardware / Locks
Damaged Surface-Holes / Paint / Rusting / Glass
Missing Door

Windows:

Cracked / Broken / Missing Panes
Damaged / Rotting Window Sill
Missing / Deteriorated Caulking / Seals / Glazing Compound
Inoperable / Not Lockable
Peeling / Needs Paint

5. GRADING AND RAINWATER DRAINAGE FROM ROOF – All rainwater shall be drained and conveyed from every roof so as not to cause dampness within the dwelling. All rainwater drainage devices, such as gutters, downspouts, leaders and splash blocks shall be in safe working order. Ground areas around the habitable unit shall be sloped or drain away from foundation walls to prevent standing water.

Other Inspectable Items: Grounds:

Erosion / Rutting Areas
Overgrown / Penetrating Vegetation
Ponding / Site Drainage (affecting unit)

Storm Drainage:

Damaged / Obstructed

6. WINDOWS, EXTERIOR DOORS AND BASEMENT OR CELLAR HATCHWAYS – Every front, rear, side and basement or cellar door shall be no less than 2'4" in width and no less than 6' 6" in height. In existing structures, if replacement to meet these requirements would be impossible or cost-prohibitive, said requirement may be waived by the grantee.

Every window, exterior door and basement or cellar hatchway shall be substantially tight and rodent-proof. In addition, the following requirements shall be met:

- a. All exterior doors to the outside or to a common public hall shall be equipped with adequate security locks. Means of egress door locks shall be easily opened from the egress side without a key or special knowledge. All windows accessible from ground level without the

aid of mechanical devices shall have a security device. Emergency escape windows shall be openable from the inside without the use of a key, code or tool;

- b. Every window sash shall be fully equipped with windowpane glazing materials free of cracks or holes, and all panes shall be secured with retaining devices or an adequate amount of putty. Said putty shall not be cracked, broken or missing;
- c. Every window sash shall be in good condition and fit tightly within its frame;
- d. Every window, other than a fixed window, shall be easily opened and held in position by window hardware;
- e. Every exterior and interior door, door hinge, door latch, and/or lock shall be in good working condition;
- f. Every exterior and interior door, when closed, shall fit well within its frame;
- g. Every window, door and frame shall be constructed in relation to the adjacent wall construction, to exclude rain and wind as completely as possible from entering the dwelling or structure;

Other Inspectable Items: Doors:

Damaged Frames / Threshold / Lintels / Trim
Damaged Hardware / Locks
Damaged / Missing Screen / Storm / Security Door
Damaged Surface – Holes / Paint / Rusting / Glass
Deteriorated / Missing Caulking / Seals (Entry Only)
Missing Door

- 7. STAIRWAYS, DECKS, BALCONIES AND PORCHES – Every interior and exterior stairway, porch, deck, balcony and appurtenance thereto, including hand and guard rails, shall be constructed to be sound and safe to use and capable of supporting the load that normal use may place upon it.

Other Inspectable Items: Stairs:

Broken / Damaged / Missing Steps
Broken / Missing Hand Railing

Patio, Porch, Deck, Balcony:

Baluster / Side Railings Damaged

- 8. SUPPLIED PLUMBING FIXTURES – Every plumbing fixture and water and waste pipe shall be properly installed in safe, sanitary working condition, free from leaks, defects, and obstructions.

9. BATHROOM, TOILET ROOM, KITCHEN AND UTILITY ROOM FLOORS – Every bathroom, toilet room, kitchen, and utility room floor surface shall be constructed to be impervious to water and to permit such floors to be easily kept clean and sanitary.

Indoor-outdoor type carpeting, when properly installed, shall be allowed in bathrooms, toilet rooms, kitchens and utility rooms except when in conflict with required interim controls or standard treatments required to comply with the lead-based paint regulation.

10. CHIMNEYS AND SMOKE PIPES – Every chimney and smoke pipe shall be adequately supported, structurally sound, and clean.
11. TREES AND VEGETATION – Trees and vegetation endangering the unit and/or its occupants shall be eliminated.
12. INTERNATIONAL RESIDENTIAL CODE FOR ONE AND TWO-FAMILY DWELLINGS – All rehabilitation work must meet or exceed the requirements of the International Residential Code as promulgated by the International Code Council in its current edition or as adopted in ordinance by the local jurisdiction.
 - a. Work must comply with the permitting and inspection requirements of the local jurisdiction.
 - b. In the absence of local permitting and inspection services, the local recipient program shall engage qualified inspectors and document code inspection and compliance.
13. LEAD-BASED PAINT – As required under 24 CFR Part 35, the Final HUD Regulation on Lead-Based Paint Hazards in Federally Owned Housing and Housing Receiving Federal Assistance, all assisted dwelling units constructed before January 1, 1978, will be evaluated for lead-based paint hazards or presumed to have lead-based paint present throughout the unit when paint is disturbed.
 - a. Evaluation will be done by a qualified, certified or licensed person as required under the regulation.
 - b. All lead-based paint hazards will be identified and reduced or eliminated through paint stabilization, interim controls or abatement with work being done by supervised, trained, qualified, certified or licensed persons as required under the regulation.
 - c. Safe work practices will be followed at all times.
 - d. Occupants shall be protected or temporarily relocated as required by the regulation. With some exceptions, as listed at 24 CFR 35.1345, occupants shall be temporarily relocated before and during hazard reduction activities to a suitable, decent, safe and similarly accessible dwelling unit that does not have lead hazards.

- e. The dwelling unit and worksite shall be secured. The worksite shall be prepared and warning signs shall be posted as required by the regulation.
- f. Clearance examinations will be performed by qualified personnel and final clearance shall be achieved as required by the regulations.

14. ENERGY CONSERVATION –

- a. Equipment, appliances, windows, doors and appurtenances replaced during rehabilitation shall be replaced with Energy Star qualified products.
- b. If feasible, attics should be insulated to R38 and walls to a minimum of R11.
- c. Replacement heating and/or cooling systems shall be properly sized as evidenced by completion of ACCA/ANSI Manual J® or an equivalent sizing calculation tool.
- d. All accessible air ducts shall be tightly sealed.
- e. Heating or cooling supply running through unconditioned space should be avoided or rerouted, but when present and accessible, shall be insulated.

15. INDOOR AIR QUALITY – The scope and conduct of rehabilitation of each dwelling unit shall take into consideration the improvement and maintenance of satisfactory and healthy air quality within the unit.

- a. A carbon monoxide detector installed per manufacturers' recommendations shall be present in each unit, and receive primary power from the building wiring or battery. If the house is all electric a carbon monoxide detector is not required.
- b. Devices and appurtenances identified to contain mercury shall be removed or replaced excluding CFL bulbs.
- c. Materials and methods used in carrying out rehabilitation, shall to the extent feasible, minimize and prevent dust, out gassing, volatile organic compounds and other contaminants within the dwelling unit.

Other Inspectable Items: Health and Safety:

Air Quality - Mold and/or Mildew Observed

Sewer Odor Detected

Propane/Natural Gas/Methane Gas Detected

16. UNIVERSAL DESIGN AND ACCESSIBILITY – Rehabilitation of each unit shall be carried out with consideration for the needs of its occupants and to the maximum practical extent in accordance

with the principles of universal design. For guidance in implementing universal design features, visit www.design.ncsu.edu/cud.

- a. The housing must meet the accessibility requirement of 24 CFR part 8, which implements section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. "Covered multi-family dwelling," as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619). Rehabilitation may include improvements that are not required by regulation or statute that permit use by a person with disabilities.

B. MINIMUM STANDARDS FOR BASIC EQUIPMENT AND FACILITIES

1. WATER SUPPLY – All fixture water supplies shall be properly connected to public or private water system.

All water supply inlet orifices (mouth of an opening from any pipe or faucet supplying water) shall have an air gap (The unobstructed vertical distance through the free atmosphere between the lowest opening from any pipe or faucet supplying water to a tank, plumbing fixture or other device and the floor level rim of the receptacle.) or shall be protected by vacuum breakers (also known as backflow preventers).

2. KITCHENS – Every dwelling shall have a kitchen room or kitchenette equipped with a kitchen sink, properly connected to both hot and cold running water lines, under pressure, and in working order.

Other Inspectable Items: Cabinets – Missing / Damaged
Countertops - Missing / Damaged
Dishwasher / Garbage Disposal – Leaking / Inoperable
Plumbing - Clogged Drains
Plumbing - Leaking Faucet / Pipes
Range Hood / Exhaust Fans - Excessive Grease / Inoperable
Range / Stove / Refrigerator- Missing / Damaged / Inoperable
Sink - Damaged / Missing

3. TOILET ROOM REQUIRED - Every dwelling unit, except as otherwise permitted for rooming houses, shall contain a room that is equipped with a flush water closet and properly installed lavatory. Said lavatory shall be properly connected to both hot and cold running water, under pressure, and shall be in working order. Fixtures shall be properly installed, free of hazards, leaks and defects, and in functional and sanitary order.

Said flush water closet shall be properly connected to the water supply, under pressure, and shall be in working order.

Other Inspectable Items: Bathroom:
Bathroom Cabinets - Damaged / Missing
Lavatory Sink - Damaged / Missing

Plumbing - Clogged Drains
Leaking Faucet / Pipes
Water Closet / Toilet - Damaged / Clogged / Missing
Ventilation / Exhaust System – Absent / Inoperable
Call-for-Aid Inoperable (where applicable)

4. PRIVACY IN ROOM CONTAINING TOILET AND BATH – Every toilet and every bath shall be contained in a room or within separate rooms which affords privacy to a person within said room or rooms. Said rooms shall not be the only passageway to the exterior.

Toilets and bathrooms shall have doors with a privacy type lock and such doors, locks and hardware shall be in working order.

5. SHARED TOILET FACILITIES – Shared toilet rooms shall be equipped with a flush water closet and lavatory basin, and shall be connected as provided in Section 2 above. In rooming house type structures, at least 1 toilet and 1 lavatory basin, properly connected as set forth above, shall be supplied for each 8 persons or fractions thereof residing within a rooming house, including members of the operator’s family whenever they share the use of said facilities, provided that in rooming houses where rooms are let only to males, flush urinals may be substituted for not more than ½ of the required number of toilets.

6. BATH REQUIRED – Every dwelling unit shall contain a bathtub and/or shower. Fixtures shall be properly installed, free of hazards, leaks and defects, and shall be in functional and sanitary order.

Potable water supply piping, water discharge outlets, backflow prevention devices or similar equipment shall not be so located as to make possible their submergence in any contaminated or polluted liquid or substance.

Said bathtub and/or shower may be in the same room as the flush water closet and lavatory, or said bathtub and/or shower may be in a separate room. In all cases, these facilities shall be properly connected to both hot and cold running water lines, under pressure, and shall be in working order.

Other Inspectable Items: Shower / Tub - Damaged/Missing

7. LOCATION OF COMMUNAL TOILETS AND BATHS – Every communal bath required to be provided in accordance with other provisions, shall be located within a room or rooms accessible to the occupants of each dwelling unit sharing such facilities, without going through a dwelling unit of another occupant and without going outside of the dwelling.

In rooming houses, said room or rooms shall be located on the same floor of the dwelling as, or on the floor immediately above or below, the dwelling unit whose occupants share the use of such facilities.

8. HOT AND COLD WATER LINES TO BATH AND KITCHEN – Every dwelling shall have supplied water-heating facilities which are properly installed; in working condition and free of leaks; properly connected to hot water lines required; and are capable of supplying hot or tempered water at not less than 110°F to be drawn for every bath, as well as general usage.

Hot water storage associated with water heating facilities shall not be less than the following minimum capacities:

- | | |
|-----------------------------|---------------------------------------|
| a. 1 dwelling unit | 30 gallons |
| b. 2 dwelling units | 40 gallons |
| c. 3 or more dwelling units | 50 gallons or more and rooming houses |

Sizes and/or number of water heaters are to be based upon the number of units served. No water heaters shall be allowed in bathrooms or bedrooms. All hot water heaters shall be properly vented and sealed and equipped with a pressure relief valve and drip leg a maximum of 6" above the floor.

The local rehabilitation division and/or building inspection division may adjust the above-required capacities upward or downward based on the type and recovery time of the hot water system.

Other Inspectable Items: Hot Water Heater:

Misaligned Chimney / Ventilation System
Inoperable Unit / Components
Leaking Valves / Tanks / Pipes
Pressure Relief Valve Missing
Rust / Corrosion

9. CONNECTION OF SANITARY FACILITIES TO SEWAGE SYSTEM – Every kitchen sink, toilet, lavatory basin and bathtub/shower shall be in working condition and properly connected to an approved public or private sewage system.

All sewers and vents shall function properly and be free of leaks and blockages.

Other Inspectable Items: Sanitary System:

Broken / Leaking / Clogged Pipes or Drains
Missing Drain / Cleanout / Manhole Covers

10. EXITS – Every exit from every dwelling and/or dwelling unit shall comply with the following requirements:

- a. It shall be functional;
- b. It shall be unobstructed;

- c. All stairways and steps of 4 or more risers shall have at least 1 handrail, and all stairways and steps that are 5 feet or more in width or open on both sides shall have a handrail on each side where possible;
- d. Every dwelling unit shall have 2 independent ways of egress;
- e. All handrails shall be not less than 30" or more than 42" vertically above the nose of the stair treads and not less than 36" above the stairway platform;
- f. All balconies and platforms that are 30" or more above grade, shall have protective guards not less than 30" in height above the balcony or platform level;
- g. All multiple dwellings (1 & 2 family residences exempted) shall have a second exit stairway or approved fire escape available to all occupants of units located on second or higher stories;
- h. All stairs and steps shall have a riser height of no more than 8" and a tread depth of no less than 9". This requirement may be waived on the programmatic level if in an existing structure, it would be impossible or cost prohibitive to meet this requirement. In such cases, new stairs could be put in having the same rise and run as the old;
- i. In basement units where one means of an exit shall be a window, it shall comply with the International Residential Code, Section 310 Emergency Escape and Rescue Openings.

11. **FIRE PROTECTION AND SMOKE ALARMS** – All fire protection systems and devices shall be in operable condition. When a dwelling is occupied by any hearing impaired person, smoke alarms shall have an alarm system designed for hearing impaired persons in accordance with NFPA 74 (or successor standards).

Smoke alarms shall be installed:

- On each story, including basement and cellar (Alarms are not required in unfinished attics and crawl spaces)
- Outside of each bedroom
- In each bedroom

Other Inspectable Items: Fire Protection:

Missing Sprinkler Head (where applicable)

Missing / Damaged / Expired Extinguishers (where applicable)

C. MINIMUM STANDARDS FOR LIGHT, VENTILATION AND HEATING

- 1. **REQUIRED WINDOW AREA** – Every habitable room, provided such rooms are adequately lighted, shall have at least one open air space. The minimum total window area, measured between stops, for every habitable room shall be as follows:
 - a. 1/12 of the floor area if two or more separate windows exist or

- b. 1/10 of the floor area if only one window exists;
- c. A minimum of 12 square feet of window area is required in habitable rooms other than kitchens;
- d. A kitchen may pass without a window area, provided there is a mechanical means of ventilation in working order.

Whenever the only window in a room is a skylight type window, the total window area of such skylight shall be equal to at least 15% of the total floor area of such room. Skylight type windows, if less than 15% of the total floor area shall be increased to 15% of the total floor area, unless another window is to be installed to provide adequate light and ventilation.

- 2. ADEQUATE VENTILATION REQUIRED – Every habitable room shall have at least one window or skylight which can easily be opened, or other such device as will adequately ventilate the room.
- 3. LIGHT AND VENTILATION REQUIREMENTS FOR BATHROOMS, TOILET ROOMS AND KITCHENS – Every bathroom, toilet room, and kitchen shall comply with the light and ventilation requirements for habitable rooms contained above, except that no window shall be required in adequately ventilated bathrooms, toilet rooms, or kitchens equipped with a ventilation system that filters or exhausts to the exterior.
Other Inspectable Items: Ventilation / Exhaust System – Inoperable (if applicable)
- 4. ALTERNATIVE LIGHT AND VENTILATION – Artificial light or mechanical ventilation complying with the International Building Code shall be permitted.
- 5. CLOTHES DRYER VENTING – Clothes dryer exhaust vent shall be a single purpose vent in compliance with the manufacturer’s instructions and vent to the exterior.
- 6. ELECTRIC OUTLETS AND SERVICE REQUIRED – Where there is suitable electricity available from supply lines no more than 300 feet away from a dwelling, including all existing dwellings now supplied with electrical services, every habitable room within such dwelling shall contain a minimum of two separate and remote wall type electric convenience outlets. Habitable rooms measuring more than 120 square feet shall contain a minimum of three separate and remote wall type electric convenience outlets. Temporary wiring, extension, or zip cords shall not be used as permanent wiring.

Every habitable room shall have at least one ceiling or wall type electric light fixture, controlled by a wall switch, or a wall type grounded electric convenience outlet controlled by a remote switch. Every toilet room, bathroom, laundry room, furnace room, and hallway (hallway where applicable) shall contain at least 1 supplied ceiling or wall type electric light fixture, controlled by a wall switch, and at least one wall type grounded electric convenience outlet. Convenience outlets used in bathrooms shall be the GFI type.

Each individual kitchen based on its size and layout shall be wired to meet the requirements of the National Electric Code (N.E.C.).

Receptacle convenience outlets in or on open porches, breezeways or garages shall be of the GFI type with a weather proof receptacle box.

All wall and/or ceiling type lighting fixtures shall be controlled by a wall switch, except porcelain type fixtures used in cellars and/or attics, which may be controlled with a proper pull chain.

All electrical equipment, appliances and wiring shall be properly installed and in safe condition.

All broken and/or missing switch and receptacle plates shall be replaced.

Minimum electrical service for each dwelling and/or dwelling unit's circuit breaker box shall be by a three wire 120/240 volt single phase service rated no less than 100 amps, or as adjusted for size and usage of equipment and appliances in accordance with the ICC Electrical Code and approved, in writing, by the electrical inspector of the local jurisdiction or program.

Other Inspectable Items: Electrical System:

- Blocked Access to Electrical Panel / Improper Storage
- Burnt Breakers
- Evidence of Leaks / Corrosion
- Frayed Wiring
- GFI - Inoperable
- Missing Breakers / Fuses
- Missing / Broken Cover Plates
- Lighting - Missing / Inoperable Fixtures

Emergency Power:

Auxiliary Lighting Inoperable (if applicable)

7. HAZARDOUS ELECTRICAL CONDITIONS – Where any condition of the electrical system in the dwelling or structure is identified as, and constitutes a hazard, the hazardous conditions shall be corrected.
8. HEATING FACILITIES – Heating facilities shall be properly installed, be in working condition and be capable of adequately heating all habitable rooms, and toilet rooms contained therein, or intended for use by the occupants capable of maintaining a room temperature of 68°F (20°C) when the outdoor temperature is within the winter outdoor design temperature for the locality as cited in Appendix D of the International Plumbing Code. Space heaters shall not substitute for a central heating unit.

Every installed central heating system shall comply with the following requirements:

- a. The central heating unit shall be safe and in good working condition;
- b. Every heat duct, steam pipe and hot water pipe shall be free of leaks and obstructions and deliver an adequate amount of heat where intended;

- c. Every seal between any and all sections of a hot air furnace shall be air-tight so noxious gases and fumes will not escape into the heat ducts;
- d. Required clearance from combustible materials shall be maintained;
- e. All chimneys and vents shall have a flue liner intact and in safe working condition.

Every existing space heater shall comply with the following requirements:

- a. No space heater burning solid, liquid or gaseous fuels shall be of a portable type;
- b. Every space heater burning solid, liquid or gaseous fuels shall be properly vented to a chimney or duct leading to outdoor space and be installed to provide proper draft;
- c. Every fuel burning space heater shall have a fire-resistant panel between it and the floor or floor covering as required by the unit's manufacturer;
- d. Whenever a space heater is located within 2 feet of a wall, said wall shall be protected with insulation sufficient to prevent overheating of the wall as required by the unit's manufacturer; ;
- e. Every space heater smoke pipe shall be equipped with approved thimbles or guards, properly constructed of non-flammable material, at the point where the pipe goes through any wall, ceiling or partition;
- f. Each dwelling and/or dwelling unit shall be supplied with its own heating systems. Local option may provide for one central forced air system to serve no more than two separate dwelling units.

Other Inspectable Items: HVAC System:

- Inoperable
- Misaligned Chimney / Ventilation System
- Noisy / Vibrating / Leaking
- Rust / Corrosion
- Boiler / Pump Leaks (where applicable)
- Fuel Supply Leaks (where applicable)
- Misaligned Chimney / Ventilation System
- Convection / Radiant Heat System Covers – Missing / Damaged

9. LIGHTING OF PUBLIC HALLS AND STAIRWAYS –

- a. Public halls and stairways in every dwelling containing 2 to 4 dwelling units shall be provided with convenient wall-mounted light switches controlling an adequate lighting system that will provide at least 2 foot candles of illumination on all parts thereof and be turned on when needed. An emergency circuit is not required for this lighting;
- b. Public halls and stairways in every dwelling containing 5 or more dwelling units shall be lighted at all times with an artificial lighting system. Said system shall provide at least 2 foot candles of illumination on all parts thereof at all times by means of properly located electric

light fixtures, provided that such artificial lighting may be omitted from sunrise to sunset where an adequate natural lighting system is provided;

- c. Wherever the occupancy of the building exceeds 100 persons, the artificial lighting system as required herein, shall be on an emergency circuit;
 - d. All basements and cellars shall be provided with a lighting system that permits safe occupancy and use of the space and contained equipment as intended, and which may be turned on when needed;
 - e. The required intensity of illumination shall apply to both natural and artificial lighting.
10. SCREENS REQUIRED – For protection against flies, mosquitoes and other insects, every door opening directly from a dwelling unit or rooming unit, to the outdoor space where feasible, shall be supplied with a screen covering at least 50% of the window area of the door, and said door shall be equipped with a self-closing device.

Every window or other opening to outdoor space used or intended to be used for ventilation shall likewise be supplied with screens covering the entire window areas required for ventilation. The material used for all such screens shall be no less than 16 mesh per inch, properly installed, and repaired when necessary to prevent the entrance of flies, mosquitoes and other insects.

Half-screens on windows may be allowed, provided they are properly installed and are bug and insect proof.

11. SCREENS FOR BASEMENT AND CELLAR WINDOWS – Every dwelling unit having operable basement or cellar windows shall be screened to prevent the entry of insects and rodents.
12. EXISTING HEATING TO DWELLINGS OR PARTS THEREOF – Every dwelling owner or operator, who rents, leases or lets for human habitation any unit contained within such dwelling, on terms either expressed or implied, shall supply or furnish heat to the occupants.

Whenever a dwelling is heated by means of a furnace, boiler or other heating apparatus under the control of the owner or operator, in the absence of a written contract or agreement to the contrary, said owner and/or operator shall be deemed to have contracted, undertaken, or bound to furnish heat in accordance with the provisions of this section to every unit that contains radiators, furnace heat duct outlets, or other heating apparatus outlets, and to every communal bathroom and communal toilet room located within such unit.

- a. Every central heating unit, space heater, water heater and cooking appliance shall be located and installed in a safe working manner to protect against involvement of egress facilities or egress routes in the event of uncontrolled fires in the structure;
- b. Every fuel burning heating unit or water heater shall be effectively vented in a safe manner to a chimney or duct leading to the exterior of the building. The chimney duct and vents shall be designed to assure proper draft, shall be adequately supported, and shall be clean;
- c. No fuel-burning furnace shall be located in any sleeping room or bathroom unless provided with adequate ducting for air supply from the exterior, and the combustion chamber for

such heating unit is sealed from the room in an airtight manner. Water heaters are prohibited in bathrooms and sleeping rooms.

- d. Every steam or hot water boiler and every water heater shall be protected against overheating by appropriate temperature and pressure limit controls;
- e. Every gaseous or liquid fuel burning heating unit and water heater shall be equipped with electronic ignition or with a pilot light and an automatic control to interrupt the flow of fuel to the unit in the event of failure of the ignition device. All such heating units with plenum have a limit control to prevent overheating.

D. MINIMUM SPACE, USE AND LOCATION REQUIREMENTS

- 1. CEILING HEIGHT – Wherever possible, no habitable room in a dwelling or dwelling unit shall have a ceiling height of less than 7' 6". At least 1/2 of the floor area of every habitable room located above the first floor shall have a ceiling height of 7' 6", and the floor area of that part of any room where the ceiling height is less than 5' shall be considered as part of the floor area in computing the total floor area of the room for the purpose of determining maximum floor area.
- 2. ROOM WIDTH – All rooms, except kitchens and/or kitchenettes and baths, shall have a minimum width of 7'. Kitchens shall have a clear passage dimension of no less than 3' between walls, appliances and cabinets.
- 3. CELLAR SPACE NOT HABITABLE – No cellar space shall be converted or rehabilitated as habitable room or dwelling unit.
- 4. REQUIREMENTS FOR HABITABLE BASEMENT SPACE – No basement space shall be used as a habitable room or Dwelling unit unless all of the following requirements are met:
 - a. Such required minimum window area is located entirely above the grade of ground adjoining such window area, or an adequate window well of sufficient size as to allow escape of inhabitants residing within such basement apartment, has been constructed;
 - b. Such basement dwelling unit or rooming unit shall be entirely sealed off from the central heating plant with a one hour fire separation. To assist grantees in evaluating existing building components, HUD has published the "Guideline on Fire Ratings of Archaic Materials and Assemblies", February 2000, available at <http://www.huduser.org/publications/destech/fire.html>;
 - c. Such basement dwelling unit or rooming unit provides two means of exit, with at least one means of opening directly to the outside;
- 5. MINIMUM STORAGE AREAS – Each dwelling unit shall have at least one closet with a minimum of 6 square feet of floor area and a minimum height of 6', located within the dwelling unit. Dwelling units with 2 or more bedrooms shall have a storage floor area of at least 4 square feet per bedroom. This storage requirement does not necessarily have to be located in the bedrooms.

E. MINIMUM STANDARDS FOR GARAGES, FENCES AND PREMISES

1. PROTECTION OF EXTERIOR WOOD SURFACES – All exterior wood surfaces shall be properly protected from the elements against decay and rot by lead-free paint, or other approved protective coating.
2. FENCES – Every residential fence shall be in a state of maintenance and repair or shall be removed. Wood materials that are not decay resistant shall be protected against decay by use of lead-free paint or by other preservative material.

If a fence is removed and replaced, said installation shall conform with all local requirements.

Other Inspectable Items: Fencing and Gates:

- Damaged / Failing / Leaning
- Holes
- Missing Sections

3. CONDITION OF PREMISES – All areas and all parts of the premises upon which any dwelling or dwelling units are located and all areas adjacent thereto and a part of the premises shall be in a clean and sanitary condition. This shall include, but not be limited to, removal of abandoned and junked automobiles, automobile bodies, chassis, parts, and trailers; inoperable machines and appliances; lumber piles and building materials not used in actual construction; tin cans, broken glass, broken furniture, boxes, crates, and other debris, rubbish, junk and garbage.

Other Inspectable Items: Retaining Walls:

- Damaged / Falling / Leaning

Health and Safety:

- Air Quality – Sewer Odor Detected

- Propane / Natural Gas / Methane Gas Detected

- Electrical Hazards - Exposed Wires / Open Panels

- Water Leaks on / near Electrical

Equipment

- Flammable Materials - Improperly Stored

- Garbage and Debris - Outdoors

- Hazards – Other / Sharp Edges / Tripping

Play Areas and Equipment:

- Damaged/Broken Equipment

- Deteriorated Play Area Surface

Refuse Disposal:

- Broken/Damaged Enclosure-Inadequate Outside Storage Space

Retaining Walls:

- Damaged/Falling/Leaning

Fire Escapes:

- Blocked Egress / Ladders

- Visibly Missing Components

Emergency Fire Exits:

- Emergency / Fire Exits – Blocked / Unusable

Missing Exit Signs

4. WATER SUPPLY - CONNECT TO WATER MAIN – Every owner of a dwelling situated on property that abuts any street or alley in which a water main is laid, shall be connected to such main to provide water service.

Other Inspectable Items: Domestic Water:

Leaking Central Water Supply
Missing Pressure Relief Valve
Rust / Corrosion or Heater Chimney
Water Supply Inoperable

5. ABANDONED WELLS AND CISTERNS – Every owner of a dwelling that contains an abandoned well or cistern on the premises shall permanently seal or fill it in a proper manner.

6. INFESTATION AND EXTERMINATION – Structures shall be free from rodent and insect infestation.

Other Inspectable Items: Health and Safety:

Infestation – Insects / Rats / Mice / Vermin

7. REQUIREMENTS FOR COMMON AREAS IN MULTI-FAMILY HOUSING – Common Areas within multi-family housing shall also be inspected and held to the same structural and rehabilitation standards contained here within.

Other Inspectable Items: Basement / Garage / Carport:

Baluster / Side Railings – Damaged / Missing

Closet / Utility / Mechanical:

Cabinets – Missing / Damaged

Community Room:

Call-for-Aid – Inoperable

Kitchen / Laundry Room / Halls / Corridors / Stairs:

Ceiling – Holes / Missing Tiles / Panels / Cracks

Peeling / Needs Paint

Water Stains / Water Damage / Mold / Mildew

Laundry Dryer Vent – Missing / Damaged / Inoperable

Lobby:

Countertops – Missing / Damaged

Office:

Dishwasher / Garbage Disposal – Inoperable

Other Community Spaces / Restrooms / Patio / Porch / Balcony:

Doors – Damaged Frames / Threshold / Lintels / Trim

Damaged Hardware / Locks

Damaged Surface (Holes / Paint / Rust / Glass)

Storage:

Doors – Door, Screen, Storm-Security Door – Missing / Damaged
Deteriorated / Missing Seals (Entry Only)

Electrical – Blocked Access to Electrical Panel

Burnt Breakers

Evidence of Leaks / Corrosion

Frayed Wiring

Missing Breakers / Covers

Hazards – Exposed Wires / Open Panels

Water Leaks on/near Electrical Equipment

Floors and Walls – Bulging / Buckling

Floor Covering Damaged / Missing Floor-Tiles

Peeling / Needs Paint

Rot / Deteriorated Subfloor

Water Stains / Water Damage/Mold/Mildew

Trim – Damaged / Missing

GFI – Inoperable

Graffiti

HVAC – Convection/Radiant Heat System Covers

Missing/Damaged

General Rust / Corrosion

Inoperable

Misaligned Chimney / Ventilation System

Noisy / Vibrating / Leaking

Lavatory Sink – Damaged / Missing

Lighting – Missing / Damaged / Inoperable Fixture

Mailbox – Missing / Damaged

Outlets / Switches / Cover Plates – Missing / Broken

Pedestrian / Wheelchair Ramp

Plumbing – Clogged Drains

Leaking Faucet / Pipes

Range Hood / Exhaust Fans – Excessive Grease / Inoperable

Range / Stove / Refrigerator – Missing / Damaged / Inoperable

Restroom Cabinet / Sink / Shower-Tub – Damaged / Missing

Smoke Detector – Missing / Inoperable

Stairs – Missing / Damaged/ Broken Steps-Handrailing

Ventilation / Exhaust System – Inoperable

Water Closet / Toilet – Damaged / Clogged / Missing

Windows – Cracked / Broken / Missing Panes

Damaged Window Sill

Inoperable / Not Lockable

Missing / Deteriorated Caulking / Seals / Glazing

Health and Safety:

Air Quality – Mold / Mildew Observed
Propane / Natural Gas / Methane Gas Detected
Sewer Odor Detected

Emergency / Fire Exits – Blocked / Unusable
Missing Exit Signs

Flammable / Combustible Materials – Improperly Stored

Garbage and Debris – Indoors / Outdoors

Hazards – Other / Sharp Edges / Tripping

Infestation – Insects / Rats / Mice / Vermin

Pools and Related Structures – Fencing – Damaged / Not Intact

Trash Collection Areas – Chutes – Damaged / Missing
Components

F. FURTHER GUIDANCE TO MINIMUM REHABILITATION STANDARDS

1. WORK WRITE-UP, COST ESTIMATES, CONSTRUCTION CONTRACTS AND CONSTRUCTION DOCUMENTS – Construction contracts, work write-ups, and construction documents must be in sufficient detail to establish the basis for uniform inspections of the housing to determine compliance with the minimum rehabilitation standards.
2. INSPECTIONS – Initial, progress and final inspections are required to be completed along with appropriate documentation of such in each property / project file. Progress and final inspections must be conducted to ensure that work is done in accordance with the applicable codes, the construction contract, and construction documents.
3. HEALTH AND SAFETY – In housing that is occupied, any life-threatening deficiencies that are identified must be addressed immediately.
4. MAJOR SYSTEMS – Major systems are: structural support; roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning. For rental housing, the remaining useful life of these systems must be estimated based on age and condition, upon project completion of each major system. (For multi-family rental housing projects of 26 units or more, the remaining useful life of the major systems must be determined through a capital needs assessment of the project.) For rental housing, if the remaining useful life of one or more major system is less than the applicable period of affordability, there must be a replacement reserve established and monthly payments made to the reserve that are adequate to repair or replace the systems as needed. For homeownership housing, each of the major systems must have a remaining useful life for a minimum of 5 years, upon project completion, or the major systems must be rehabilitated or replaced as part of the rehabilitation work.
5. CAPITAL NEEDS ASSESSMENT – For multi-family rental housing projects of 26 units or more, a capital needs assessment of the project is required to determine all work that will be performed in the rehabilitation of the housing and the long-term physical needs of the project.

6. DISASTER MITIGATION – Where relevant, it will be required that the housing to be improved to mitigate the impact of potential disasters (e.g., earthquake, hurricanes, flooding, and wildfires) in accordance with State and local codes, ordinances, and requirements, or such other requirements as HUD may establish.

7. BROADBAND – HUD includes internet connectivity in the regulatory definition of “utility connections.” All National Housing Trust Fund-assisted housing must meet the minimum property standards upon completion, so efforts to provide broadband internet access, where applicable, must be undertaken as part of the project.