

STATE OF NEBRASKA

**Community Development Block Grant - Disaster  
Recovery (CDBG-DR) Program**

**DR-4420 / Winter Storm Ulmer, 2019**


APA3 / Amendment Three (Substantial)  
Overview of Changes to Action Plan  
*Public Comment Period Oct. 16 – Nov. 15, 2023*

**Public Meeting** | November 1, 2023

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# Agenda

- Introductions
  - Overview of Proposed Changes
  - The Story So Far
  - Reasoning for Proposed Changes
  - Next Steps
  - Questions
- 

# Introductions | Disaster Recovery

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**Jenny B. Mason**

*Director of Disaster Recovery*

**Jennifer Grove**

*Attorney*

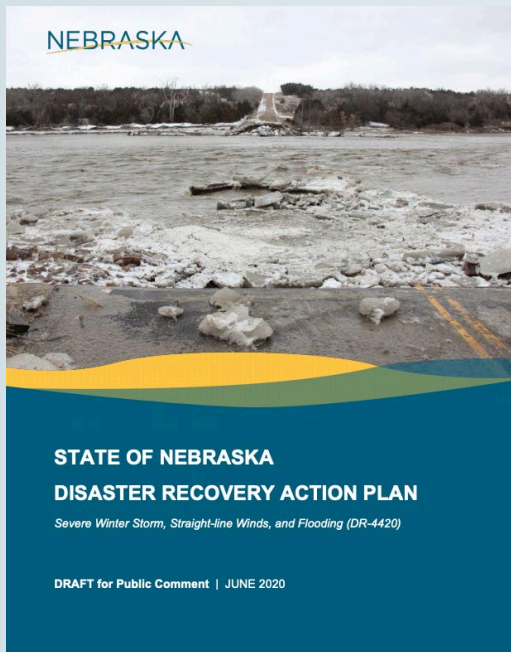
**Tia Loftin**

*Infrastructure Program Manager*

**Christina Zink**

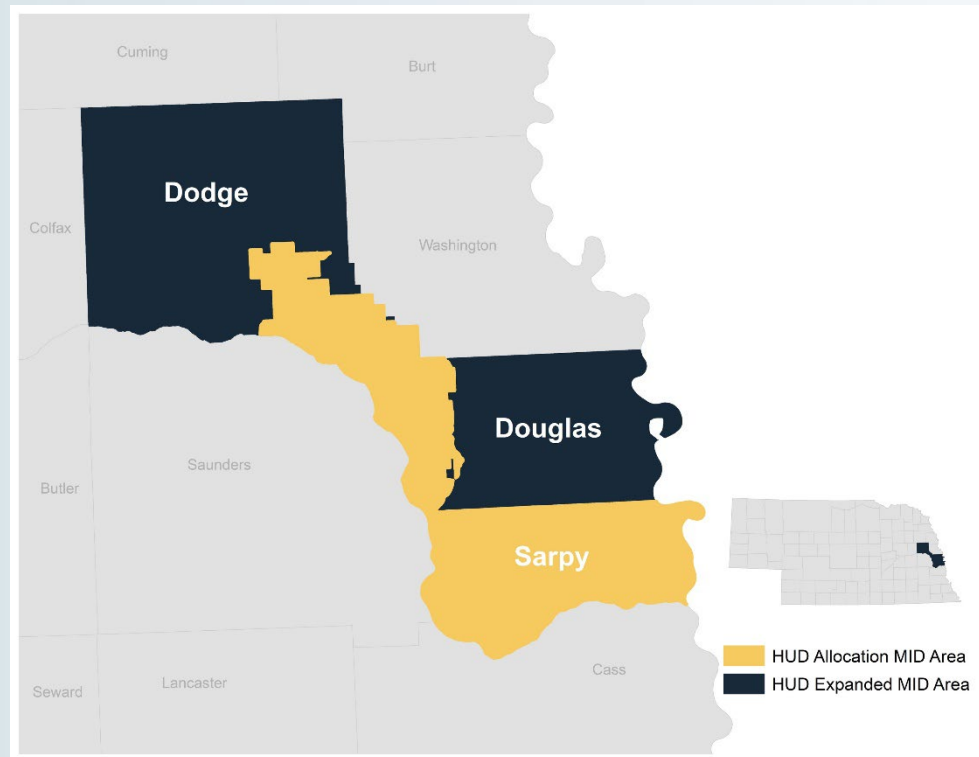
*Housing Program Manager*

# Purpose of Action Plan, as amended



- HUD requires CDBG-DR grantees to submit an **Action Plan**.
- The Action Plan describes
  - Unmet Needs
  - The proposed programs that will be used to address unmet needs using CDBG-DR funds
  - How Nebraska will meet other HUD requirements
- The Initial Action Plan and any Substantial Amendments involve Public Comment Periods


# MID Area | Allocation of Funding



80% is allocated for the “Most-Impacted and Distressed” (MID) Area which includes **Dodge, Douglas, and Sarpy** counties.

# Overview of Proposed Changes | APA3

A substantial amendment, the proposed changes to the Action Plan under APA3 involve:

- Expanding the Affordable Housing Construction Program (AHCP) by \$26M to address continuing unmet needs for affordable housing;
    - Discontinue the Homeowner Assistance Program (HAP) and reallocate its \$11M budget to AHCP, reflecting community preference for and needs for more housing construction;
    - Reallocate a portion of available Infrastructure Match Program (Match) funds to support additional funding for housing construction;
  - Expand the Infrastructure Match Program (Match) funds to address community needs for gap-funding in support of other infrastructure needs (e.g., non-PA and HMGP projects); and
  - Add flexibility in delivery of planning activities to align with recent HUD guidance, expand eligibility, and offer a higher award threshold.
- 

# Overview of Proposed Changes | APA3

## Why the changes?

Demonstrate the evolving long-term recovery needs to date, reflecting:

- higher than anticipated need for housing programs and
- lower than anticipated need for infrastructure programs.

## What changed?

- Program budgets adjusted to account for updated unmet needs.
- Other related updates and clarifications.

## What now?

If these proposed changes are accepted, DED will undertake the necessary revisions to policies and procedures to implement changes made by this Substantial Amendment.



# The Story So Far

Document	Status
Amendment 3 (APA3)	Substantial; <i>Public comment period underway</i>
Amendment 2 (APA2)	Non-Substantial; HUD approval: July 5, 2023
Amendment 1 (APA1)	Substantial; HUD approval: March 14, 2022
Initial Action Plan	HUD approval: May 3, 2021

*Per the underlying FRN, Substantial Amendments require a public comment period. For more information, refer to the Citizen Participation Plan available on the [website](#), CDBG-DR>[HUD Requirements](#)>Citizen Participation Plan. Additional information is also available from the main page under [General Program Information](#)>Outreach and Citizen Participation.*



# AFFORDABLE HOUSING CONSTRUCTION PROGRAM

**Program Total:** \$56,800,000

**Priority Area:** HUD-defined MID

**National Objective(s):**

LMI Housing

**Activity Type:** Construction of Housing; Rehabilitation

## Eligible Activities:

- Construction of rental housing
- Construction of owner-occupied housing
- New construction of homes for sale to LMI homeowners
- Rehabilitation of rental housing
- Gap Financing

# The Story So Far: Housing

Program Area*	Status
LIHTC	2022 QAP Allocations: April 2022 (4%)   June 2022 (9%) 2023 QAP Allocations: Oct. 2022 (9%)   Feb. 2023 (4%) 2024 QAP Allocations: Oct. 2023 (9%)  2024 QAP Application: Nov. 2023 (4%) 2025 QAP Application: May 2024 (9%) 2025 QAP Application: Nov. 2024 (4%)
HPP	<ul style="list-style-type: none"><li>• Application Launch: May 2023</li><li>• Award Notifications: July 2023</li><li>• Future Cycles: <i>TBD</i></li></ul>
Small Rental	<ul style="list-style-type: none"><li>• Program Overview Webinar: Nov. 16, 2023</li><li>• Application Launch: Q1 2024</li></ul>

*\*By design, the AHCP does not " earmark" funds for the three core program areas.*

# The Story So Far: Housing

Program Allocation Updates (\$) by Amendment				Initial Awards by Funding Program			
<i>Last Revised October 2023</i>				<i>Last Updated: October 2023</i>			
Program	Action Plan & APA1 (Substantial) Allocated Amount	Amendment 2 (Non-Substantial) New Total (\$)	Amendment 3 (Substantial) New Total (\$)	Awarded Projects	Total DR Awarded*	Allocated ADCs	Remaining for Award
<b>Affordable Housing Construction</b>	<b>\$26,000,000</b>	<b>\$30,800,000</b>	<b>\$56,800,000</b>	<b>13</b>	<b>\$24,750,000.00</b>	<b>\$3,712,500.00</b>	<b>\$28,337,500</b>
LIHTC				12	\$24,000,000.00	\$3,600,000.00	
HPP				1	\$750,000.00	\$112,500.00	
Small Rental				0	\$-		
<b>Homeowner Assistance Program</b>	<b>\$11,000,000</b>	<b>\$11,000,000</b>	<b>\$-</b>	<b><i>Program Discontinued (APA3)</i></b>			

# INFRASTRUCTURE MATCH PROGRAM

**Program Total:** \$43,691,100

**Eligible Area:** HUD- and State-defined MID

**National Objective(s):** LMI;  
Urgent Need

**Activity Type:** Public Facilities  
and Improvements

## **Eligible Activities:**

- Acquisition of Real Property
- Public Facilities and Improvements
- Code Enforcement
- Clearance
- Public Services
- Non-Federal Share
- Planning

# The Story So Far: Infrastructure

Program Area	Status
Public Assistance	<ul style="list-style-type: none"><li>• Application intake: June 2022</li><li>• Initial Eligibility Review Finalized: December 2022</li><li>• Notice of Award Issued (NEMA): June 2023</li></ul>
Hazard Mitigation	<ul style="list-style-type: none"><li>• Application intake: June 2022</li><li>• Initial Eligibility Review Finalized: December 2022</li><li>• Notices of Award Issued: April 2023</li></ul>

# The Story So Far: Infrastructure

Program Allocation Updates (\$) by Amendment				Initial Awards by Funding Program			
<i>Last Revised October 2023</i>				<i>Last Updated: October 2023</i>			
Program	Action Plan & APA1 (Substantial) Allocated Amount	Amendment 2 (Non- Substantial) New Total (\$)	Amendment 3 (Substantial) New Total (\$)	Awarded Projects	Total DR Awarded	Allocated ADCs	Remaining for Award
Infrastructure Match	\$63,491,100	\$58,691,100	\$43,691,100	234	\$14,884,027.59	\$2,043,758.84	\$26,763,314
PA	\$49,778,602	\$44,978,602		222	\$7,776,765.58	\$1,009,122.54	
HMGP	\$13,712,498	\$13,712,498		12	\$7,107,262.01	\$1,034,636.30	
Other Infrastructure	<i>Introduced via APA3</i>			0	\$-		

*\*With APA3, the Match Program would no longer "earmark" funds for the core program areas.*

So, what are we proposing and why?

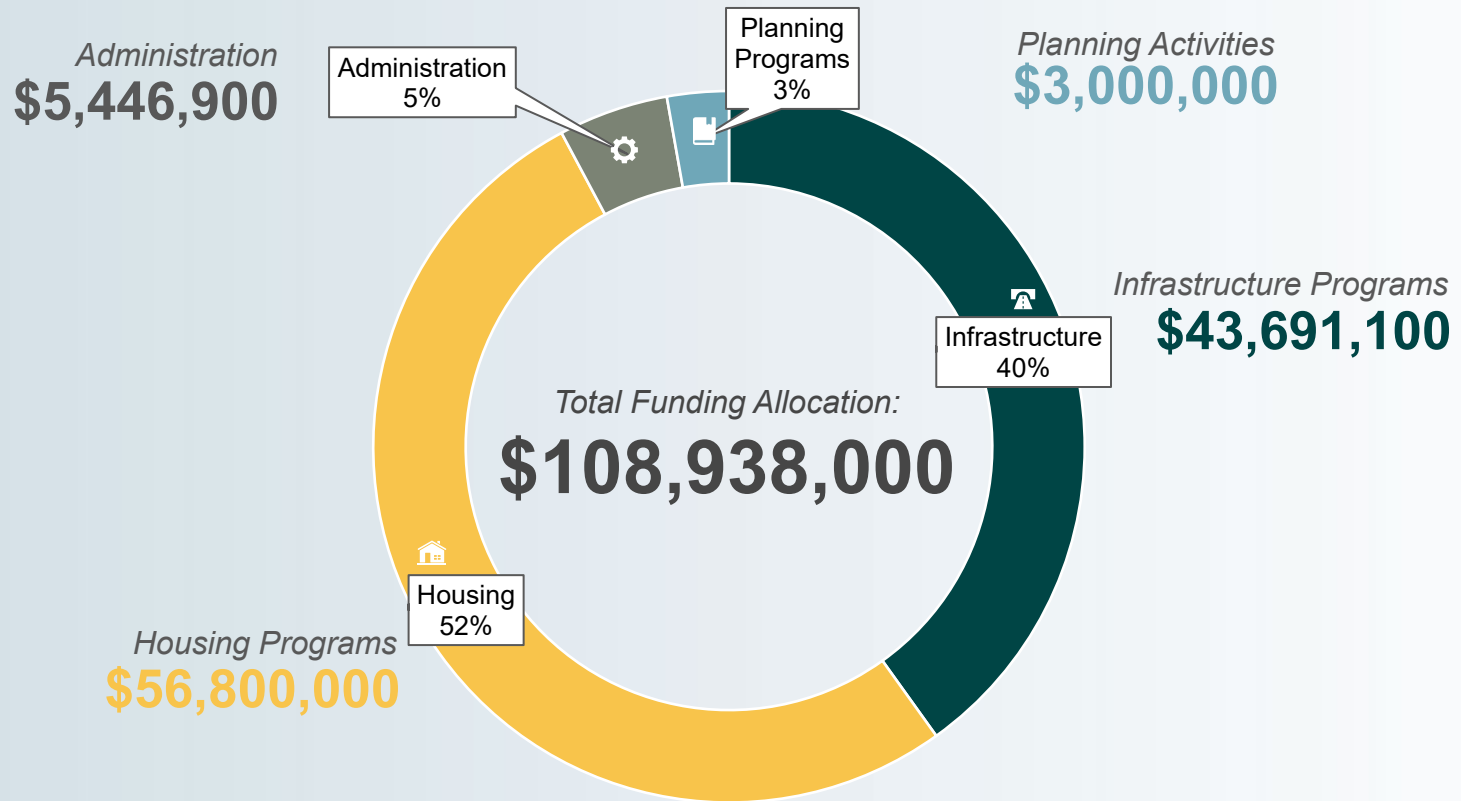
# PROPOSED CHANGES | APA3



# Proposed Changes | APA3

Program Allocation Updates (\$) by Amendment								
Program	Initial AP & APA1 (Substantial)		APA2 (Non-Substantial)			APA3 (Substantial)		
	Allocation Amount	%	Change Amount (\$)	New Total (\$)	%	Change Amount (\$)	New Total (\$)	%
	<b>Affordable Housing Construction</b>	\$26,000,000	23.9%	\$4,800,000	\$30,800,000	28.3%	\$26,000,000	\$56,800,000
<b>Homeowner Assistance (HAP)</b>	\$11,000,000	10.1%	\$-	\$11,000,000	10.1%	(\$11,000,000)	\$-	0.00%
<b>Infrastructure Match</b>	\$63,491,100						\$43,691,100	40.11%
<b>PA</b>	\$49,778,602	45.7%	(\$4,800,000)	\$44,978,602	41.3%	(\$30,000,000)		
<b>HMGP</b>	\$13,712,498	12.6%	\$-	\$13,712,498	12.6%	\$15,000,000		
<b>Planning</b>	\$3,000,000		\$-	\$-		\$-	\$3,000,000	2.75%
<b>Administration</b>	\$5,446,900	5.00%	\$-	\$5,446,900	5.00%	\$-	\$5,446,900	5.00%
<b>Total</b>	\$108,938,000	100%	\$-	\$108,938,000	100%	\$-	\$108,938,000	100%

# Proposed Reallocation of Funding | APA3



## PLANNING & CAPACITY BUILDING

**Program Total:** \$3,000,000

**Eligible Area:** HUD- and State-defined MID

**Activity Type:** Planning

### **Eligible Activities:**

- Risk Analysis and Risk Communication
- Housing Recovery Planning
- Housing Resilience Planning
- Affordable Housing Planning

# Affordable Housing Construction Program

## Summary of Changes

### Description

Expand the AHCP by \$26M

- \$15M from Infrastructure Match Program
- \$11M from Housing Assistance Program

### Reasoning

These changes follow application cycles under AHCP and Match, and outreach to housing groups, reflecting:

- a higher than anticipated interest in funding for housing construction and
- a lower than anticipated interest in funding to support local cost-share needs for FEMA Public Assistance projects.

### Key Area(s) of Action Plan

Section 2 | *Unmet Needs Assessment*

Section 3 | *Method of Distribution*

Section 5 | *Program Design*

# Homeownership Assistance Program

## Summary of Changes

<b>Description</b>	<p>Discontinue standalone housing program for non-construction housing activities in Homebuyer Assistance Program (HAP)</p> <ul style="list-style-type: none"><li>• reallocate all HAP funding to AHCP</li><li>• See also changes to AHCP</li></ul>
<b>Reasoning</b>	<p>These changes follow an assessment of available housing programs and remaining unmet needs in affordable housing construction with tie-back to the 2019 disaster.</p>
<b>Key Area(s) of Action Plan</b>	<p>Section 2   <i>Unmet Needs Assessment</i></p>
	<p>Section 3   <i>Method of Distribution</i></p>
	<p>Section 5   <i>Program Design</i></p>

# Planning Activities

## Summary of Changes

<b>Description</b>	Add flexibility in delivery of planning activities and streamline administrative responsibilities.
<b>Reasoning</b>	<ul style="list-style-type: none"><li>• Maintain focus on HUD-MID while also expanding eligible area, allowing universities to participate in implementing activities.</li><li>• Increase in grant maximum amounts.</li><li>• Allow for allocating certain costs related to action plan and action plan amendments changes align with updated HUD policy guidance.</li></ul>
<b>Key Area(s) of Action Plan</b>	Section 2   <i>Unmet Needs Assessment</i>
	Section 3   <i>Method of Distribution</i>
	Section 5   <i>Program Design</i>

# Infrastructure Match Program

## Summary of Changes

<b>Description</b>	Allow additional cost-share flexibility in Match projects.
<b>Reasoning</b>	Account for additional infrastructure needs, including <ul style="list-style-type: none"><li>• FEMA project cost overruns attributed, in part, to the increase in construction costs due to macroeconomic issues including inflation and labor shortages.</li><li>• Other gap-funding in support of other infrastructure needs.</li></ul>
<b>Key Area(s) of Action Plan</b>	Section 2   <i>Unmet Needs Assessment</i> Section 5   <i>Program Design</i>



# Proposed Changes | APA3

## Available Resources

Document Name	Description
Summary of Changes	<ul style="list-style-type: none"><li>Summarizes changes, including identification of, reasoning for, and location (e.g., section number) of those changes within the action plan.</li><li>Incorporates public comments.</li></ul>
Clean Copy	<ul style="list-style-type: none"><li>Consolidated version.</li><li>Includes all changes as summarized in the Summary of Changes document, no markup.</li></ul>
Red-lined Copy	<ul style="list-style-type: none"><li>Reference document.</li><li>Marked up copy that should be read alongside the Summary of Changes.*</li></ul>
Public Hearing Slide Deck	This presentation will be available from the DR website under <a href="#">General Program Information</a> > <i>Outreach and Citizen Participation</i> .

*\*In some instances, the names of enumerated figures, tables, and subsections may appear as changed in the red-lined copy where they are not actually changed.*

# What is "Red-lined"?

## 5.3.2 HOUSING RESILIENCE PLANNING PROGRAM

### 5.3.2 HOUSING RESILIENCE PLANNING PROGRAM

Program Total: \$2,250,000

Projected Start and End Date:

Start: Q2 2021 End: Q4 2026

Eligible Activities:

- Housing Recovery Planning
- Housing Resilience Planning
- Affordable Housing Planning

### Eligible Area

#### Eligible Area

HUD-defined and State-defined MID areas.

### Eligible Applicants

All counties, municipalities, and economic development districts representing HUD- or State- defined MID areas. Subrecipients from outside of the HUD-defined MID area will not be eligible to receive funding under this program, and universities.

### Administering Entities

For

For

*\*In some instances, the names of enumerated figures, tables, and subsections may appear as changed in the red-lined copy where they are not actually changed.*

Public Comment Period: October 16 – November 15, 2023

# **NEXT STEPS | APA3**

## *Anticipated Timeline | APA3*

Date(s)	Action	Responsible Party(ies)
October 16, 2023	Publish Action Plan Amendment	DED
October 16 thru November 15, 2023	30-Day Public Comment Period	DED; Public
November 15 thru November 22, 2023	Respond to Public Comments	DED
November 22, 2023	Submit Action Plan Amendment to HUD for Approval	DED, HUD
January 6, 2024	Last Day for HUD to Approve	HUD
Following HUD Approval	Post updated program materials	DED

*All CDBG-DR program materials, including the Action Plan, as amended, are available on the [CDBG-DR webpage](#).*

# Public Comment Period

DED will accept public comments regarding the proposed amendment until **5:00 p.m. C on Wednesday, November 15, 2023.**

To submit a comment, email the comment to [ded.publiccomment@nebraska.gov](mailto:ded.publiccomment@nebraska.gov) with the subject line **“Proposed CDBG-DR Amendment”**.



## Public Comment Inbox

TO: [ded.PublicComment@nebraska.gov](mailto:ded.PublicComment@nebraska.gov)

Subj: “Proposed CDBG-DR Amendment”

Additional information about this public hearing is available in the [Press Release](#).

# Submit a Public Comment

**What:** Public Comment on Proposed CDBG-DR Amendment

**When:** **October 16, 2023 – November 15, 2023, 5PM C**

**How:**

1. *Email:* [ded.PublicComment@nebraska.gov](mailto:ded.PublicComment@nebraska.gov) with the subject line “Proposed CDBG-DR Amendment”.

2. *Mail:* Nebraska Department of Economic Development  
ATTN: CDBG-DR Program Manager  
245 Fallbrook Blvd, Ste. 002  
Lincoln, NE 68521

Please be sure to reference “Proposed CDBG-DR Amendment”.



Thank you for your attention.

**QUESTIONS?**



# Contact Information

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## CDBG-DR Assistance

HCD, Disaster Recovery Division

[ded.cdbgdr@nebraska.gov](mailto:ded.cdbgdr@nebraska.gov)

To stay up-to-date on CDBG-DR information, please join the CDBG-DR listserv at <https://opportunity.nebraska.gov/cdbg-dr-contact-form/>.

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## Public Comment Inbox

TO: [ded.PublicComment@nebraska.gov](mailto:ded.PublicComment@nebraska.gov)

Subj: "Proposed CDBG-DR Amendment"