

STATE OF NEBRASKA

2018

Annual Action Plan

Proposed

DEPARTMENT OF ECONOMIC DEVELOPMENT

DIVISION OF HOUSING AND COMMUNITY DEVELOPMENT

Housing, Community Development, & Economic Development Programs



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Homeless Services & HOPWA Services Programs



Effective July 1, 2018 - June 30, 2019

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Executive Summary

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

Introduction

The 2018 Annual Action Plan (AAP) is the fourth annual plan and update to the Nebraska Housing and Community Development Program's Consolidated Plan (Consolidated Plan), a five-year plan (2015-2019) addressing the State's housing and community development needs. Federal resources provided by HUD that are discussed within the Plan include: Community Development Block Grant (CDBG); the HOME Investment Partnerships Program (HOME); National Housing Trust Fund (HTF); Emergency Solutions Grant (ESG); and Housing Opportunities for Persons with AIDS Program (HOPWA).

HUD Standard Form 424 (Application for Federal Assistance) is submitted as part of the plan to request federal funding for the State of Nebraska.

In addition, where appropriate, information on two State Programs will also be discussed with the Consolidated Plan that includes the Nebraska Affordable Housing Trust Fund (NAHTF) and the Homeless Shelter Assistance Trust Fund (HSATF). The CDBG, HOME, HTF, and NAHTF Programs are administered through the State of Nebraska, Department of Economic Development (DED) and DED is the lead agency responsible for coordinating the development of the Consolidated Plan. The ESG, HOPWA, and HSATF Programs are administered through the State of Nebraska, Department of Health and Human Services (DHHS) and DHHS works in conjunction with DED in developing the Consolidated Plan. ESG & HSATF resources are utilized by DHHS & administered under the Nebraska Homeless Assistance Program.

The Nebraska Homeless Assistance Program is a grant program that is comprised of the Nebraska's Homeless Shelter Assistance Trust Fund (HSATF) and the Department of Housing and Urban Development (HUD) Emergency Solutions Grant (ESG). The Department of Housing and Urban Development's Emergency Solutions Grant program funds are matched with HSATF. The HSATF is state funding that is based on a twenty-five cent set-aside on each \$1,000.00 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales. The Nebraska Department of Health and Human Services funds all areas of the state with the Homeless Shelter Assistance Trust

Fund dollars. The ESG funds received by NDDHS from HUD for the state exclude the entitlement cities Omaha and Lincoln; these cities are responsible for distribution and administration of their own ESG award. Allocations are based on a formula based on HUD's CoC Preliminary Pro Rata Need Report. The formula is determined using a minimum funding amount for all regions, population base, poverty data, and pro-rata percent. Through the formal funding process, NHAP adjusted the funding formula for the 2018 funding to emphasize equitable distribution to provide resources across the State of Nebraska as well as identification of quality projects and programs.

The Nebraska 2018 Annual Action Plan affirms the goals and objectives of Title I of the Housing and Community Development Act of 1974, as amended, and the National Affordable Housing Act of 1990, as amended, which relate to major commitments and priorities of DED and DHHS. This complex set of goals can be compressed into three main areas that include:

Provide Decent Housing

- Assist homeless persons to obtain appropriate housing
- Assist those threatened with homelessness
- Retain affordable housing stock
- Make available permanent housing that is affordable to low-income persons without discrimination
- Increase the supply of supportive housing for persons with special needs

Provide a Suitable Living Environment

- Improve safety and livability of neighborhoods
- Increase access to quality facilities and services
- Reduce isolation of income groups within an area through decentralization of housing opportunities and revitalization of deteriorating neighborhoods
- Restore and preserve properties of special value for historic, architectural, or aesthetic reasons
- Conserve energy resources

Expand Economic Opportunity

- Create and retain jobs accessible to low income persons
- Empower low income persons to achieve self-sufficiency to reduce generations of poverty in federally assisted public housing

The State views this mandate as an opportunity to extend and strengthen partnerships among organizations in the public, private, and nonprofit sectors. Through this collaboration, DED and DHHS hope to streamline approaches to meet these goals and effectively use limited resources. Nebraska anticipates receiving the following amounts in FY 2018.

CDBG: \$9,700,000 HOME: \$3,000,000
ESG: \$942,120
HOPWA: \$422,073
HTF: \$3,000,000

In addition, the State anticipates receiving the following amounts for two State-funded programs which supplement and are utilized as match for the federal HOME and ESG programs. Below are the anticipated amounts for FY 2018.

NAHTF: \$11,250,000 HSATF: \$3,650,027

In addition to the estimated 2018 federal awards, there is federal prior year resources that will be utilized under a number of State Programs:

CDBG: \$7,103,680
HOME: \$1,226,053
HOPWA: \$65,000
HTF: \$4,539,486

Covering all areas of the State, except metropolitan Omaha, Lincoln, Bellevue, and Grand Island the Annual Action Plan identifies a one-year action plan for program implementation. As CDBG Entitlement Areas, Omaha, Lincoln, Bellevue, and Grand Island receive funds for these programs directly, and are required to prepare and submit their own Annual Action Plans.

Summarize the Objectives and Outcomes Identified in the Plan

The State of Nebraska identified five priorities, which summarize the goals of the five-year Consolidated Plan.

The main priorities and objectives within the 2018 AAP include:

- Housing Priority Need
- Community Development Priority Need
- Economic Development Priority Need
- Homeless Services Priority Need
- HOPWA Services Priority Need

Through the development of the Consolidated Plan it was determined that there were three overarching objectives guiding the proposed activities that include:

- Provide Decent Housing
- Provide a Suitable Living Environment
- Expand Economic Opportunity

Outcomes were developed to show how programs and activities would benefit a community or the persons within a community served. The three outcomes that will illustrate the benefits of each activity funded by the CDBG, HOME, HTF, ESG, or HOPWA Programs are:

- Improved availability/accessibility
- Improved affordability
- Improved sustainability

The future activities funded within the next two years will support at least one objective and one outcome as described above. The statutes for CDBG, HOME, HTF, ESG, and HOPWA covered by the Consolidated Plan Rule include a number of basic goals discussed in the Housing and Community Development Act, as amended, and the National Affordable Housing Act, as amended. The framework for realizing these objectives and outcomes will be associated with the specific priorities, as noted above.

Nebraska Performance Measures are established to monitor the State's progress on outcomes and objectives for each Program, including CDBG, HOME, HTF, ESG, and HOPWA. While each Program has successfully provided services in the past, these new measures should enhance the State's

ability to quantify the results for those activities and to convey a complete picture of housing and community development activities.

In regard to the Emergency Solutions Grant (ESG) Program, the purpose of the Nebraska Homeless Assistance Program (NHAP) is to provide an overall "Continuum of Care" approach to address the needs of people who are homeless and near homeless in Nebraska by: assisting in the alleviation of homelessness; providing temporary and/or permanent housing for persons who are homeless; and encouraging the development of projects that link housing assistance with efforts to promote self-sufficiency.

The intent of the DHHS is to award funds through a regional and programmatic (i.e. activity specific) allocation process. Organizations are encouraged to seek other sources of funding and collaborate and coordinate programs and services with other organizations to optimize the use of NHAP funds. Program outcomes for NHAP are to provide decent affordable housing, establish and maintain a suitable living environment, and expand economic opportunity for individuals and families in Nebraska, particularly for low- and very-low-income persons. Strategies employed within the NHAP which are used to help reach each of these outcomes include:

- promoting self-sufficiency for persons who are homeless;
- involving a Continuum of Care approach by providing shelter and services in collaboration with other agencies;
- providing services and programs that fill an identified gap in the regional/local Continuum of Care;
- providing services and programs that if discontinued would create a substantial gap in the regional/local Continuum of Care; and
- providing services and programs designed to prevent homelessness in the regional/local Continuum of Care.

Within the framework of reaching the NHAP outcomes, funding is focused on program activities which help to improve availability/accessibility of programs to end homelessness throughout Nebraska, cost effectiveness of programs, and sustainability of the funding proposals.

Evaluation of Past Performance

The State of Nebraska has been successful in its efforts to address the priority needs identified in the 2015-2019 Consolidated Plan. The State has worked hard to further the primary national CDBG objective of developing viable urban communities by providing decent housing, suitable living environments, and expanding economic opportunities, principally for low-and moderate-income persons (LMI). The projects selected by the State in FY 2018 address the priority needs identified in the State's 2015-2019 Consolidated Plan.

Specific details about past performance by the State on priorities covered by the 2010-2014 Consolidated Plan and strategies contained in Annual Action Plans are available through the State's Annual Performance Reports that are submitted to HUD each year. The 2014 Annual Performance Report was submitted to HUD in September of 2015 and is the most recent report submitted. The Report contains information regarding significant achievements in meeting the needs of Nebraskans. The State began utilizing its Outcome Performance Measurement System in 2006. This measurement system allows the State to better measure the accomplishments of activities funded with CDBG, HOME, HTF, ESG, and HOPWA.

Summary of Citizen Participation Process and consultation process

The State of Nebraska will conduct a public hearing on housing and community development issues in order to allow citizens the opportunity to provide input for the 2018 Annual Action Plan and HTF Allocation Plan. The public hearing will be held in Lincoln, with satellite sites throughout the state that will include a number of communities across the state. The public hearing will be held approximately two-three weeks after the proposed plan is posted to the DED website in order to provide time for the public to review it before the 30-day public hearing begins with the public hearing as the start date of the 30-day period. This decision is a result in part from public comments last year that more time would be appreciated for review before the public comment period begins.

Prior to the public hearings, public notices will be published in newspapers throughout the state. Public hearing notices via email will also be posted on the DED website; distributed to local officials; developers;

non-profit organizations; Development Districts; the NCHH; and the CoCs throughout the state. Copies of the plan will also be distributed to public libraries throughout the state, per the citizen participation plan of the 2015-2019 Consolidated Plan.

Additional information regarding the public hearings and comments and responses will be presented below in the summary of public comments and responses after the public comment period ends and before the final plan document is submitted to HUD.

Summary of public comments

Public comments will be summarized here after the public comment period is over and before the plan is submitted to HUD.

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

This will be completed once the public comments are received and reviewed.

7. Summary

The Nebraska Department of Economic Development will be the lead agency and the Nebraska

Department of Health and Human Services will be the partner agency for the 2018 Annual Action Plan.

PR-05 Lead & Responsible Agencies - 91.300(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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	Department of Economic Development/Community Development Division
HOPWA Administrator	NEBRASKA	Department of Health & Human Services/Public Health Division
HOME Administrator	NEBRASKA	Department of Economic Development/ Housing & Field Operations Division
ESG Administrator	NEBRASKA	Department of Health & Human Services/Children & Family Services Division
HTF Administrator	NEBRASKA	Department of Economic Development/Housing & Field Operations Division

Table 1 – Responsible Agencies

Narrative

The Annual Action 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 & Field Operations Division by DED. 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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AP-10 Consultation - 91.110, 91.300(b); 91.315(I)

1. Introduction

DED & DHHS consulted with local governments, State agencies, non-profit organizations, & other members of the public on the preparation of the 2018 AAP.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

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 Annual Action Plan. Some efforts for coordination included meeting with housing providers that included for-profit developers, members of the regional Development Districts; non profit organizations; and community members throughout the state. In addition, consultation with the behavioral health and mental health advisory committee was conducted. DED routinely attends 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 1994 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 for the DED and the Nebraska Homeless Assistance Program (NHAP). The NHAP includes funding from both ESG and the State's Homeless Shelter Assistance Trust Fund (HSATF). The NCHH, in coordination with DED and DHHS, support a statewide Continuum of Care (CoC), 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 and HOPWA program staff are actively engaged in Commission 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. The Commission meets regularly to discuss, plan, and

make recommendations for coordination and cooperation of the supports and services needed to service homeless persons and persons at risk of homelessness.

In addition, the state's updated 10 Year Plan to Prevent and End Homelessness was unveiled in January of 2015. This plan serves as a roadmap for achieving four overarching goals which include:

To end chronic homelessness; end veteran homelessness; end child, family, and youth homelessness; and finally, set a path to reducing overall homelessness. The Plan will drive increased leadership, collaboration and civic engagement across multiple agencies, groups, and organizations such as public and private housing, disability, health, financial, employment, elderly, child welfare, victims of domestic violence, and other for profit and nonprofit service agencies.

Additional efforts at consultation are noted below.

In regard to the HTF Program, DED consulted with a number of entities that included 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 outreach was to obtain information on how to best administer the HTF Program, particularly in the areas of special needs housing and permanent supportive housing. Through collaboration and consultation, the State was able to develop the HTF Allocation Plan for the current Program Year.

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 NHAP program is to provide an overall "Continuum of Care" approach to address the needs of people who are homeless or are at risk of homelessness. Nebraska has 2 ESG entitlement cities, which comprise the Region 6 Lincoln CoC and the Region 7 Omaha CoC, with the remaining local 5 regions collectively forming the Balance of State (BoS) CoC, whereas the entire state is referred to as the Continuum of Care System. As NHAP provides federal funds to the BoS CoC and HSATF dollars statewide, NHAP coordinates with the entire Continuum of Care System. NHAP coordinates

directly with the Continuum of Care System on an ongoing basis by participating in Continuum meetings, leading strategic planning efforts, supporting the Homeless Management Information System (HMIS), and participating in the establishment and evaluation CoC funding priorities. NHAP also takes advantage of being within DHHS to access and coordinate with other divisions and units within DHHS that serve populations that experience homeless. NHAP is able to coordinate at a state level with the Division of Behavioral Health, the Division of Children and Family Services Protection and Safety as well as the Division of Public Health to address gaps in services, such as promoting more partners in SOAR. NHAP also coordinates with the state and county correctional settings in efforts to assist those existing correctional settings.

To effectively help facilitate a cohesive statewide CoC network, a State Continuum of Care Committee has been established which includes representation from governmental, 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 the 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;
- 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. Although NHAP is not a board member of the NCHH or its State Continuum of Care Committee, NHAP attends the meetings to share information and seek input in effort to coordinate in meeting 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: Nebraska – 10 Year Plan to Prevent and End Homelessness. The State Continuum of Care Committee will host regularly scheduled quarterly meetings in which diverse stakeholders will be represented, including but not limited to: State partners, Federal partners, CoC providers, consumers, and advocates. The 10 Year 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 was receiving technical assistance through ABT; however, there is no longer funding to support continued technical assistance. 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, 2 of the local 7 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.

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, Sarpy, 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, Washington, Douglas counties [The City of Omaha excluded]).

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 host a monthly in person regional meeting 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.

In regard to the HTF Program, DED consulted with a number of entities that included 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 outreach was to obtain information on how to best administer the HTF Program, particularly in the areas of special needs housing and permanent supportive housing.

Through collaboration and consultation, the State was able to develop the HTF Allocation Plan for the current Program Year.

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

NHAP gathers input from the regional CoC's through a survey to determine identified needs of services prior to posting and allocating funding for the program year. NHAP also utilizes HMIS data and prior year's data to review past program performance and identified gaps in services across the state.

State ESG 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 the NCHH, and is periodically reviewed and revised as appropriate. For FY 18, the funding allocation was adjusted as the pro-rata formula resulted in a dramatic reduction in funding available in one region, which would create a void of available services for homeless and near-homeless. The pro-rata formula also resulted in a significant increase in another region, whom has access to other funding sources. The final NHAP formula adjusts for these needs to ensure continuity of available services across Nebraska.

After final allocations are determined, the final amounts available are posted on the NHAP website for public review. The application process for ESG and HSATF dollars requires applicants obtain approval by their respective local regional CoC group to verify the CoC has determined the proposed applicant's services are congruent with gaps in services and/or the needs of the homeless and those at risk of homeless in that region of the state. NHAP also actively seeks input from the CoC System in pursuing different approaches to allocating funds across the state.

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), the Department of Health and Human Services, and other collaborating agencies.

The State consults with the BoS CoC on performance standards and outcome evaluations through monthly conference calls which NHAP regularly participates in. 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. Various work groups developed by the BoS CoC address current and future needs, the NMIS subcommittee, the New/Project Renewal Performance Evaluation subcommittee, and the Coordinated Entry planning committee and governing body.

The BoS CoC full membership and work committees assist the BoS CoC in moving forward with updating the ESG Written Standards for the BoS CoC; address, develop, and implement the Coordinated Entry assessment system; and respond to HUD's policies on prioritization of chronic homeless. The BoS work committees are currently in the process of finalizing the updated the Written Standards for the ESG/CoC Service Delivery to clarify the Coordinated Entry requirements.

Additionally, the 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. The BoS met all required elements for development and implementation of coordinated entry through the All Doors Lead Home System and have also implemented 27 of 39 recommended CE elements and implemented 13 of 17 optional CE elements. See

<https://ccfl.unl.edu/community-services-management/coordinated-entry/coordinated-entry-providers>

for the Coordinated Entry Manual and other resource materials. These efforts have established the “All Doors Lead Home Coordinated Entry” which was established as a collaborative approach to find and connect homeless persons as quickly as possible to the most appropriate and effective housing. 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 (PHS), Rapid Rehousing (RRH) and Transition Aged Youth (TAY) programs. The goal for this year is to further include Transitional Housing as part of the “All Doors Lead Home” coordinated entry process. There have been initial training sessions for the Coordinated Entry process and there will be continual training with both the main access points and collaborating agencies over the next year to ensure a seamless Coordinated Entry process.

The New Project/Renewal Performance Evaluation subcommittee is another subcommittee under the BoS CoC. The focus of the New Project/Renewal Performance Evaluation subcommittee is to establish priorities and develop a process for the use of new BoS CoC resources, assess the performance of funded programs, and make recommendations to the BoS CoC on the reallocation of BoS CoC resources. While this planning subcommittee has been established for the distribution of CoC funding, NHAP is actively engaged in this process to ensure equitable distribution of services as is required per 24 § 576.400 as well as to collaborate on outcome evaluations whenever possible.

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 the HMIS system as administered by Center for Children Families and the Law (CCFL). The BoS CoC has selected CCFL as the HMIS administer.

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.

2. Agencies, groups, organizations and others who participated in the process and consultations, see below

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 through emails and phone calls.
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 through emails & phone calls.
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 through emails and phone calls.
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 through emails & phone calls.
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 through emails and phone calls.
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 through phone calls.
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 through emails.
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 through emails, phone calls, and in person.</p>

9	Agency/Group/Organization	Nebraska Commission on Housing and Homelessness (NCHH)
	Agency/Group/Organization Type	Housing 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 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>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 through emails, phone calls, and in person.</p>

10	Agency/Group/Organization	Nebraska Community Action Agencies
	Agency/Group/Organization Type	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

	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 through emails.
11	Agency/Group/Organization	Nebraska County Clerks
	Agency/Group/Organization Type	Other government - County

<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 through emails.</p>

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 through email, phone calls, and in person.
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 through emails.
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 through emails, phone calls, and in person.
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 through emails, phone calls, and in person.
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 through emails, phone calls, and in person.
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 through emails, phone calls, and in person.
18	Agency/Group/Organization	For Profit Developers
	Agency/Group/Organization Type	Various

	<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 through emails, phone calls, and in person.</p>
19	<p>Agency/Group/Organization</p>	<p>Nebraska Investment Finance Authority (NIFA)</p>
	<p>Agency/Group/Organization Type</p>	<p>Quasi-Government</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 through emails, phone calls, and in person.</p>

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

When developing the Con Plan and AAP, the State consulted with all the agencies that the State felt would provide relevant info for the Plans. The state of Nebraska has over 100 public housing agencies and does not have one agency that oversees all of these agencies. Contacting each agency individually would not have been feasible, but the State attempted to provide as broad an outreach as possible through the distribution of info through multiple methods.

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	Neb Commission on Housing & Homeless.	Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska, 2015-2025; Various homeless assistance providers, in consultation with CoCs; consultants; federal and state partners; housing developers; and other interested parties developed the 10 Year Plan than 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.
City of Omaha-Comp Plan	City of Omaha	Having a better understanding of the planning efforts within the largest cities within Nebraska will aid at ensuring a coordinated effort is made through the utilization of resources.
City of Lincoln-Comp Plan	City of Lincoln	Having a better understanding of the planning efforts within the largest cities within Nebraska will aid at ensuring a coordinated effort is made through the utilization of resources.
City of Bellevue-Comp Plan	City of Bellevue	Having a better understanding of the planning efforts within the largest cities within Nebraska will aid at ensuring a coordinated effort is made through the utilization of resources.
City of Grand Island-Comp Plan	City of Grand Island	Having a better understanding of the planning efforts within the largest cities within Nebraska will aid at ensuring a coordinated effort is made through the utilization of resources.

Table 3 - Other local / regional / federal planning efforts

Narrative

The info above provides a description of the coordination & consultation efforts made by the State.

AP-12 Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen participation is an essential component of a statewide planning effort. Nebraska strongly encourages public participation throughout the consolidated planning process.

OPPORTUNITIES FOR PUBLIC PARTICIPATION

The importance of public participation (including consultation with advisory groups) in the development of the AAP cannot be overstated. Each year DED must update objectives and describe the State's method of distribution of funds to effectively utilize HUD assistance. A public hearing is held to obtain citizen comments on the AAP. The hearing is held at a time and location considered convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. Opinions from the public regarding the best time and date for such hearings are welcome.

Citizens and other interested parties are given an opportunity for reasonable and timely access to information and records relating to the AAP, and the use of assistance under the programs it covers. Copies of the 2018 Annual Action Plan, the State's 2015-2019 Consolidated Plan, and other related information may be obtained by accessing the Department's website at: <http://www.opportunity.nebraska.org> or by contacting a staff member at one of the numbers listed 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	Public Hearing	Non-targeted/ broad community	Public hearing will be held 2-3 weeks after AAP is posted to the DED website.	Will be answered after public comment period over.	Will be answered after public comment period over.	https://opportunity.nebraska.gov
2	Newspaper Ad	Non-targeted/ broad community	Public notices of the public comment period will be placed in Nebraska publications.	Will be answered after public comment period over.	Will be answered after public comment period over.	
3	Internet Outreach	Non-targeted/ broad community	The Notice of Public Comment Period will be posted on NEDED's website, and sent out to stakeholder groups via listservs.	Will be answered after public comment period over.	Will be answered after public comment period over.	
4	Library Outreach	Non-targeted/ broad community	To increase opportunities for public participation and public comment, the Proposed Plans will be sent to 16 libraries throughout Nebraska.	Will be answered after public comment period over.	Will be answered after public comment period over.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The following table describes the anticipated estimated resources to be allocated throughout Nebraska delineated by program type. These anticipated estimated resource projections are made for FY 2018 and the remaining one year of the 2015-2019 Consolidated Plan. Prior Year Resources, or carryover from the previous fiscal year, are also included in the table. The narrative description for each funding source provides the estimated amount or percentage of state administration dollars that are estimated under each federal or state resource.

Nebraska anticipates receiving the following estimated amounts in FY 2018 from HUD: CDBG: \$9,700,000; HOME: \$3,000,000; ESG: \$941,814; HOPWA: \$422,073; HTF: \$3,000,000.

The following are 2018 estimated distribution amounts to be distributed for each program which include previous year resources: CDBG: \$16,412,680 and in addition, \$1,320,926 CDBG Program Income to be utilized per the AAP for projects eligible to use CDBG Program Income; NAHTF: \$10,700,000; HOME: \$3,926,053; HTF: \$7,239,486; ESG: \$871,178; HOPWA: \$400,410.81.

The CDBG, HOME, HTF, ESG, and HOPWA funding levels shown in AP-15 “Expected Resources” are estimated amounts. The State will adjust this estimated proposed allocation to match the actual allocation amounts from HUD. For CDBG, HOME, HTF, and HOPWA, the budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

In regard to ESG, the following applies. In the event that Nebraska does not receive the estimated funding from HUD, NHAP will adjust for the difference with HSATF funding to align with the NHAP allocation announcement. Through the planning process, NHAP has allocated reserve funding in the event that the ESG funding is less than anticipated. Conversely, if the ESG award is greater than expected, NHAP has the ability to carryover HSATF for reallocation in the next fiscal year.

In addition, Nebraska anticipates utilizing the following additional estimated State resources in FY 2018: NAHTF: \$11,250,000, with \$10,700,000 utilized for project distribution throughout the state and \$550,000 utilized for state administration; HSATF: \$3,650,027, with \$3,575,027 utilized for project distribution and \$75,000 utilized for state administration. Additional information is identified within the Annual Action Plan as well as supplemental information is provided regarding the annual allocation of resources. This additional information is also provided within the Appendix (<https://opportunity.nebraska.gov/aap>).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$9,700,000	\$1,320,926	\$7,103,680	\$18,124,606	\$11,020,926	See below

Table - Expected Resources – Priority Table

Narrative Description

CDBG resources are provided to units of local government for CDBG-eligible activities. In 2018, an estimated \$9,700,000 is anticipated as allocation from HUD. \$9,309,000 of that is estimated to be distributed, in addition to \$7,103,680 in carryover, making an estimated \$16,412,680 distribution, in addition to an estimated \$1,320,926 CDBG program income distribution to eligible projects from the State Revolving Loan Fund. A portion of resources is reserved for state administration and technical assistance funds that may not exceed 3% of the total base allocation plus \$100,000 as per 24 CFR 570.489(a). The State will provide up to \$291,000 (3% of the total CDBG allocation) as match to the CDBG general administration allocation. The State’s matching cost contribution is at least equal to the amount of CDBG general administration funds expended for Program Year 2018. This amount fulfills the one-to-one matching requirements of the CDBG Program. 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.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$3,000,000	\$0	\$1,226,053	\$4,226,053	\$3,000,000	See below

Table - Expected Resources – Priority Table

Narrative Description:

HOME resources are primarily used for rental development and acquisition, rehab, and resale activities. State sub-recipients of resources may also receive administrative funds. A portion of NAHTF resources will be committed as HOME Match in order to meet the 2018 25% HOME Match requirement for Nebraska for non-administrative funds. No less than 15% of resources will be utilized for CHDO-eligible activities as is required. 10% of the 2018 allocation from HUD will be used for state administration.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	Public Federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$422,073	\$0	\$65,000	\$487,073	\$422,073	See below

Table - Expected Resources – Priority Table

Narrative Description:

The majority of HOPWA resources are Federal monies that are often matched with resources from Community Action Agencies and frequently paired with services and sources through the Ryan White Part B Program. A Portion of HOPWA funds will be used for administrative expenses provided to the HOPWA Program Sponsor. Of the total estimated \$487,073 resources made available this program year, \$400,410.81 are estimated to be distributed, and \$86,662.19 will be utilized for state administration. \$65,000 in prior year resources will be utilized.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public Federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$941,814	\$0	\$0	\$941,814	\$941,814	See below

Table - Expected Resources – Priority Table

Narrative Description:

Homeless Shelter Assistance Trust Fund (HSATF) resources will be utilized to supplement ESG activities. A portion of these funds will be utilized as match for the ESG Program. An estimated \$871,178 will be distributed, and an estimated \$70,636 will be utilized for state administration.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	Public Federal	Acquisition Multifamily rental new construction Multifamily rental rehab New construction for rental	\$3,000,000	\$0	\$4,539,486	\$7,239,486	\$3,000,000	See below

Table - Expected Resources – Priority Table

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. A portion of the available resources (10%) may be utilized by the State for planning and administration.

During the 2018 Program Year, it is estimated that under the three set-asides there will be available for project distribution the 2018 estimated allocation and \$4,539,486 of prior year project resources which are delineated by Set-aside budgets per the previous year and current year HTF Allocation Plans:

CRANE Set-aside: \$639,486, which is comprised of an estimated \$500,000 in 2018 distribution and \$139,486 in prior year resources.

Targeted Needs Set-aside: \$2,100,000, which is comprised of an estimated \$700,000 in 2018 distribution and \$1,400,000 in prior year resources.

Permanent Housing Set-aside: \$4,500,000, which is comprised of an estimated \$1,500,000 in 2018 distribution and \$3,000,000 in prior year resources.

There is also an estimated \$600,000 for state administration, of which \$300,000 is prior year resources.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Nebraska Affordable Housing Trust Fund	Public State	Acquisition Admin and Planning Homebuyer assistance Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$10,516,241	\$0	\$733,759	\$11,250,000	\$10,500,000	See below

Table - Expected Resources – Priority Table

Narrative Description:

An estimated \$11,250,000 in Nebraska Affordable Housing Trust Fund (NAHTF) resources will be utilized to further housing programs throughout the state. Of the total estimated allocation, \$10,700,000 will be distributed, \$733,759 of that being prior year resources. \$550,000 will be utilized for state administration. A minimum of \$637,500 of the NAHTF allocation will be committed as HOME Match to meet the 2018 HOME Match requirement of 25% for Nebraska for the \$2,550,000 in non-administration funds. There is \$1,226,053 in prior year resources which has already had required 25% Match applied, therefore no further Match is added here. Total HOME Funds for 2018 will be \$3,776,053, which will be used within the tax credit cycles. There is also \$150,000 HOME resources under the new CHDO Operating Program this Program Year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other (HSATF)	Public State	Financial Assistance Overnight shelter Permanent housing in facilities Permanent housing placement Public Services Rapid re-housing (rental assistance) Rental Assistance Services Short term or transitional housing facilities Supportive services Transitional housing	\$2,731,571	\$0	\$750,000	\$3,481,571	\$3,000,000	See below

Table - Expected Resources – Priority Table

Narrative Description:

Homeless Shelter Assistance Trust Fund (HSATF) resources will be utilized to supplement ESG activities. A portion of these funds will be utilized as match for the ESG Program. ESG funds, through the Nebraska Homeless Assistance Program, will be leveraged with Nebraska Homeless Assistance Trust Fund (HSATF)

resources. The HSATF is state funding that is based on a twenty five cent set aside on each \$1,000.00 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales. Annually HSATF provides on average between 1.9-2.5 million dollars to the Nebraska Homeless Assistance Program. HSATF dollars serve as the HUD match funds, which well exceeds the 1:1 requirement. 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.

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

DED funds will be utilized in order to meet the leveraging requirements of the CDBG Program, that of providing matching funds for the CDBG administration allocation. This will fulfill the one to one matching requirements of the CDBG Program. The State will provide up to \$291,000 as match to the CDBG general administration allocation (3% of total CDBG allocation for state administration and technical assistance). This amount will ensure that the State's matching cost contribution is at least equal to the amount of CDBG general administration funds in excess of \$100,000 expended for administration as per 24 CFR 570.489(a). The technical assistance is provided by the state for capacity building for local governments and nonprofit organizations.

CDBG funds will be also be matched with other local resources as explained in the methods of distribution within the annual plan and the 2018 CDBG Application Guidelines for the Comprehensive Development, Downtown Revitalization, Economic Development, Downtown Revitalization, Planning, Public Works, Tourism, and Water-Waste Water categories.

In addition, Nebraska anticipates utilizing the following additional estimated State resources in FY 2018 which demonstrate leveraging from the state: NAHTF: \$11,250,000, with \$10,700,000 utilized for project distribution throughout the state and \$550,000 utilized for state administration; HSATF: \$3,650,027, with \$3,575,027 utilized for project distribution and \$75,000 utilized for state administration. Additional information is identified within the Annual Action Plan and supplemental information is provided regarding the annual allocation of resources. This additional information is also provided within the

Appendix. (<https://opportunity.nebraska.gov/aap>).

HOME funds will be leveraged with other resources including private mortgages, low income housing tax credits, private equity, and local resources. NAHTF resources will be committed as HOME Match in order to meet the reduced 2018 25% HOME Match requirement for Nebraska for non-administration funds.

ESG funds, through the Nebraska Homeless Assistance Program, will be leveraged with Nebraska Homeless Shelter Assistance Trust Fund (HSATF) resources. The HSATF is state funding that is based on a twenty five cent set aside on each \$1,000.00 of the value of real estate sold in Nebraska and collected via the documentary tax stamp on real estate sales. Annually HSATF provides on average 2.5 million dollars to the Nebraska Homeless Assistance Program. For FY 18 and FY19, NHAP is releasing additional funding (approximately one million dollars per fiscal year) to support the expansion of Rapid Rehousing and Homelessness Prevention to reduce the number of and length of stay for program participants that are unsheltered or residing in emergency shelter.

HSATF dollars serve as the HUD match funds, which well exceeds the 1:1 requirement. 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.

In the event that Nebraska does not receive the estimated funding from HUD, NHAP will adjust for the difference with HSATF funding to align with the NHAP allocation announcement. Through the planning process, NHAP has allocated reserve funding in the event that the ESG funding is less than anticipated. Conversely, if the ESG award is greater than expected, NHAP has the ability to carryover HSATF for reallocation in the next fiscal year.

Additionally, some of the NHAP funded subrecipients are awarded HUD CoC funds to provide Permanent Supportive Housing (PSH) housing and essential services to individuals and/or are recipients of HUD Veterans Affairs Supportive Housing (VASH) funds to provide services for homeless veterans. 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.

Lastly, many of the NHAP subrecipients receive additional funding support from a variety of other resources, such as the Community Services Block Grant, state and federal funding sources, and local charitable foundations (such as the United Way) to provide a comprehensive array of services to the participants within their homeless programs. These CoC, VASH, and other federal/State/local funds are not included in the calculations for ESG match for HUD reporting but are considered when DHHS is evaluating financial stability of the organization in the NHAP applicant review process and for DHHS' strategic planning with collaborating agencies.

For the HOPWA Program, the majority of leveraging of funds include public funding, such as Ryan White Parts B and C, the Housing Choice Voucher Program, and the Calico Support Group which consisted of contributions toward rent assistance, medications, Section 8 vouchers, financial and housing utility assistance, food, transportation to care appointments, and HIV care. Leveraging from private funding by the Nebraska AIDS Project-Flowers' Fund provided food and personal care, transportation. Other funding leveraged was from resident rent payments by client to private landlord. 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 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 publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable.

Discussion: not applicable, see above response

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Program	2015	2019	Affordable Housing	Statewide	Housing Priority Need	CDBG: \$3,100,000 HOME: \$3,926,053 National Housing Trust Fund: \$7,239,486 Neb Afford Housing Trust Fund: \$10,700,000	Rental units constructed: 70 Household Housing Unit Rental units rehabilitated: 30 Household Housing Unit Homeowner Housing Added: 25 Household Housing Unit Homeowner Housing Rehabilitated: 50 Household Housing Unit
2	Community Development Program	2015	2019	Non-Housing Community Development		Community Development Priority Need	CDBG: \$11,312,680	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 55,500 Persons Assisted Facade treatment/business building rehabilitation: 35 Business
3	Economic Development Program	2015	2019	Non-Housing Community Development	Statewide	Economic Development Priority Need	CDBG: \$2,000,000	Jobs created/retained: 100 Jobs Businesses assisted: 7 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Nebraska Homeless Assistance Program (NHAP)	2015	2019	Homeless	Statewide	Homeless Services Priority Need	ESG: \$871,178 Homeless Shelter Assistance Trust Fund: \$3,575,027	Tenant-based rental assistance / Rapid Rehousing: 452 Households Assisted Homeless Person Overnight Shelter: 7224 Persons Assisted Homelessness Prevention: 1483 Persons Assisted
5	HOPWA Program	2015	2019	Homeless Non-Homeless Special Needs	Statewide	HOPWA Services Priority Need	HOPWA: \$472,461	Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted Other: 45 Other

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Program
	Goal Description	Goal Description: Within the Nebraska Affordable Housing Program 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 the NAHTF.
2	Goal Name	Community Development Program
	Goal Description	Goal Description: This Program includes planning; public works; water/waste water; comprehensive development; and downtown revitalization activities. A wide variety of activities are funded that primarily serve LMI persons throughout the state.
3	Goal Name	Economic Development Program
	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	Nebraska Homeless Assistance Program (NHAP)
	Goal Description	<p>Rapid Rehousing-Securing permanent housing options for persons who are homeless with emphasis on addressing needs of the individuals to encourage stability.</p> <p>Homeless Shelter- Providing 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>Homelessness Prevention-Assure needed services are provided to people who are at risk of becoming homeless to prevent entry into emergency shelter or other situations which are not suitable for individuals and/or families.</p>
5	Goal Name	HOPWA Program
	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>The activities in the "Other" section below include: Short-term Rent/Mortgage Assistance, Permanent Housing Replacement and Supportive Services.</p>

AP-21 HOPWA Annual Goal – 91.320(c)(3)&(e)

Narrative (Optional)

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

The activities in the “Other” section below includes: Short-term Rent/Mortgage and Utilities Assistance, Permanent Housing Replacement and Supportive Services.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The following are allocation priorities for CDBG, HOME, HTF, ESG, and HOPWA. In addition allocation priorities for NAHTF and HSATF resources.

Funding Allocation Priorities

	Housing Program (%)	Community Development Program (%)	Economic Development Program (%)	Nebraska Homeless Assistance Program (NHAP) (%)	HOPWA Program (%)	Total (%)
CDBG	19	69	12	0	0	100
HOME	100					100
HOPWA	0	0	0	0	100	100
ESG	0	0	0	100	0	100
HTF (National Housing Trust Fund)	100	0	0		0	100
Other Homeless Shelter Assistance Trust Fund		0	0	100	0	100
Other Neb Afford Housing Trust Fund	100	0	0	0	0	100

Table 6 – Funding Allocation Priorities

Reason for Allocation Priorities

Through experience and consultation, the allocation priorities for CDBG and HOME 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 admin expenses, but does include the \$1,320,926 in CDBG program income that is expected to be used during the 2018 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 7

geographical regions in Nebraska based on a base amount and pro rata 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 as a Request for Proposal (RFP) is in process. 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.

The National Housing Trust Fund (HTF) Program provides additional funds for the housing program and through the third year of implementation of the program additional housing will be provided for extremely low income (ELI), including homeless families.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

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 4 Objectives that have been developed in order to meet the Housing Priority and include:

- 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.

The Nebraska Affordable Housing Program will utilize CDBG, HOME, HTF, and NAHTF resources in order to address the Priority Need mentioned above as well as in order to address those specific objectives associated with the priority need.

The Community Development Priority Need has been developed in order to strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development. This Priority Need includes 3 primary objectives that include:

- 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 Priority Need mentioned above and to address those specific objectives associated with the priority need.

The Economic Development Priority Need includes 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 3 primary objectives that include:

- 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 Priority Needs mentioned above and to address those specific objectives associated with the priority need.

The Homeless Services Priority Need has been developed in order 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 2 primary objectives that include:

- 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

NHAP's priority of making funding available statewide addresses 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 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.

As per HUD regulations, ESG funds will be allocated among several service categories. Each year, an allocation formula is calculated and utilized in distributing NHAP grant funds. The formula helped ensure an equitable distribution of funds throughout the entire state. The formula was 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 NOFA 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 will be made to reduce the impact of the change by region.

The Nebraska Homeless Assistance Program is in the process of identifying service gaps in Nebraska and will be coordinating with other state and federal funders and the Department of Economic Development in addressing unmet needs in our communities. To meet this goal, NHAP is identifying available programs throughout the State of Nebraska, requesting feedback from direct homeless service providers and the regional Continuums of Care, monitoring collaboration between homeless service providers, promoting a "no wrong door" to service provision, encouraging the use of the coordinated entry system and evaluation of individuals using the VI-SPDAT tool and collecting data on the length of subrecipients' waitlists, and rates of individuals turned away due to a lack of shelter space and/or funding availability. This feedback and data will be evaluated, and if specific service gaps are identified, the possibility for special project funding will be evaluated for feasibility and availability of funding.

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 includes 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.

The HOPWA Services Program will utilize HOPWA resources in order to address the Priority Need mentioned above and to address those specific objectives associated with the priority need. 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 five federal resources which include CDBG, HOME, HTF, ESG, and HOPWA. In addition, a brief discussion will be provided regarding two State programs related to the Nebraska Affordable Housing Trust Fund (NAHTF) and the Homeless Shelter Assistance Trust Fund (HSATF).

Within the IDIS eCon Planning Suite System, the Distribution Methods by State Program Table has been generated (See below). For purposes of providing more detailed information the following table has been supplemented and reformatted in order to provide the public with a clearer picture of the State’s methods of distribution.

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 105(a) of the amended 1974 Housing and Community Development Act that meet national CDBG objectives. During Program Year 2018, projects will be funded in order to meet one of the three CDBG National Objectives, that of benefit to low- and moderate-income persons.

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 10% of the total CDBG allocation for use as needed among categories. An adjustment of more than 10% 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 2018 Annual Action Plan, the overall CDBG Program includes activities within the Housing Priority Need, the Community Development Priority Need, and the Economic Development Priority Need.

A description and details of each State Program is identified below.

STATE PROGRAM NAME: CDBG Owner Occupied Rehabilitation Program (OOR)

Funding Sources: CDBG funds

Within the Housing Priority Need, CDBG funds will be utilized for owner occupied rehabilitation activities and made available to LMI persons at or below 80% of the Area Median Income.

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

The CDBG OOR Program will be implemented by the Community Development Block Grant Program (CDBG) within DED. CDBG will utilize an application cycle with the other CDBG programs titled “Community Development Block Grant Application Guidelines”. The CDBG OOR application will be chapter 7 within those guidelines. CDBG funds will only be available for applicants that are CDBG-eligible units of general local government. The CDBG entitlement communities of Omaha, Lincoln, Bellevue, and Grand Island are not eligible for resources.

Specific application questions will be developed for the CDBG OOR Cycle and will include a section for Need/Impact; Collaboration; Project Financing/Credit; Match; Readiness/Capacity; and Financial Management. In addition, a section for the Municipal Equalization Fund (MEF) score which will be calculated for each applicant and added to the total application score and an additional section for Achievements.

The total points available for any given application will be 650 points. Applicants will be required to obtain a minimum of 200 points, and must meet all the threshold requirements, in order to be scored and considered for an award recommendation. In addition, failure of the Applicant to score a minimum number of total points on the application will result in the Application not being funded during the CDBG OOR Cycle.

General Administration activities may not exceed \$25,000 or 10% of the total amount of CDBG project costs, (also known as CDBG project activity costs) whichever is less. The Housing Management activities may not exceed 10% of project costs (also known as CDBG project activity costs) or \$45,000, whichever is less. General Administration and Housing Management activities do not require any matching funds.

Below is a summary of the milestones:

Milestone Summary	Date
Pre-Application Due	August 4
Full Application Due	October 5
Anticipated Award Notification	November 2018

Below is the Scoring Criteria Matrix that will be utilized within the CDBG OOR Program Category for applications.

Selection Criteria	Maximum	Overall Threshold Minimum
Need/Impact	125	50
Collaboration	100	-
Project Financing/Credit	75	-
Match	25	-
Readiness/Capacity	125	50
Financial Management	75	-
Municipal Equalization Fund (MEF) Score	100	-
Achievements	25	-
Total	650 points	200 points

Need/Impact and Readiness/Capacity will each have a minimum threshold of 50 points, with the entire application having an overall threshold minimum of 200 points in order for the application to receive funding.

Specific questions regarding the application criteria will be made available within the CDBG OOR Cycle Application Guidelines.

Match is not required; however, applicants that commit local funds (including “other” funds and/or in-kind contributions) to the OOR project will be eligible for up to 25 points. No minimum points are required in order to meet threshold for matching funds. See Section 4.02 of the Application Guidelines for more detailed information.

Overall, the information provided above is a summary of the criteria that will be utilized within the CDBG OOR Cycle.

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

As noted above within the description of the criteria used to select applications, this information was a summary of the criteria. Complete information regarding the application criteria will be made available within the CDBG OOR Application Guidelines. The Guidelines 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:

<http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/cdbg-forms>

Describe how resources will be allocated among funding categories.

\$3,100,000 in CDBG resources will be available for the CDBG Owner Occupied Rehabilitation Program.

The maximum grant amount for CDBG OOR activities will be in an amount up to \$450,000 per community.

Describe threshold factors and grant size limits.

The threshold factors within the CDBG OOR Program are noted below.

The Housing and Community Development Act 1974 objective funds use is for activities that primarily benefit low and moderate-income persons. Application activities are required to meet CDBG National Objective of benefit to low-moderate income persons (LMI) as a threshold for review and funding consideration.

CDBG Owner-Occupied Rehabilitation activities must meet the LMI national objective through benefitting low- to moderate-income households (LMH).

Additional threshold factors include: whether the applicant is an eligible unit of general local government classified as a municipality (i.e. City or Village); and whether the applicant has achieved the expenditures of previous grant funds for other projects.

The maximum grant amount for CDBG OOR activities will be in an amount up to \$450,000 per community. Match is not required; however, applicants that commit local funds (including “other” funds and/or in-kind contributions) to the OOR project will be eligible for up to 25 points. Total match may include in-kind services or source contributions, or other activities that the community has identified that will enhance the overall project. Matching funds may be considered only if they are spent during the project period (Date of Release of funds through the project completion date). The amount of match must be given in dollars.

General Administration activities may not exceed 10% of project costs (also known as CDBG project activity costs) or \$25,000, whichever is less. Housing Management activities may not exceed 10% of project costs (also known as CDBG project activity costs) or \$45,000, whichever is less.

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

Through the CDBG OOR Program additional owner-occupied rehabilitation will occur for housing units occupied by LMI persons throughout the state. The additional number of units rehabilitated will be quantified within the Annual Performance Report under the “Housing Program” Goal that is completed after the conclusion of the previous Program Year.

STATE PROGRAM NAME: Comprehensive Development (CD)

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 in the Comprehensive Development Category for CDBG-eligible activities that include those identified as State Priorities in the Housing, Public Works, Planning, and Downtown Revitalization categories and made available to LMI persons or in areas that are defined under the Slum and Blight National Objective criteria. During the 2018 Program Year, the State prioritizes meeting the LMI National Objective. A complete list will be identified within the Appendix (<http://opportunity.nebraska.gov/community/grants/documentslibrary-a-forms/annual-action-plan>).

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

Projects are carried out in two phases. The first is a planning phase for the completion of a pre-development study that defines a comprehensive strategy of revitalization to stabilize, support, and enhance clearly defined residential neighborhoods. Such target neighborhoods have a concentration of persons of low- to moderate-income. During the 2016 Program Year, communities were selected for Phase I (pre-development) funding.

Following the successful completion of the pre-development study, the second phase allows for implementation of activities identified in the pre-development study. Applicants have the opportunity to receive implementation (Phase II) funding over a two-year period. The first allocation (“Year 1”) of implementation resources were awarded during the 2017 Program Year. Those communities that receive resources for Phase II activities will have the opportunity to utilize additional resources for a second allocation (“Year 2”) of implementation funding. The purpose of the second allocation of funding is to continue (or expand) the activities completed during the first allocation of Phase II resources.

There are two “options” for applying for an award under Year 2: (A) where activities are continuation of those approved and included in the Year 1 contract and (B) where activities are expanded beyond those approved in Year 1 with the additional caveat that housing activities are not allowed under Year 2 unless they were incorporated in Year 1. For Option A, the Year 1 application may be updated for the activities and accomplishments undertaken and underway as it relates to those continued activities proposed for Year 2. For Option B, the Year 2 application must also include additional information regarding the newly proposed activities and their relationship to those activities and accomplishments undertaken and underway as a part of Year 1.

Eligible communities include only those communities that previously received Phase I and Phase II Year 1 resources.

The CDBG entitlement communities of Omaha, Lincoln, Bellevue, and Grand Island are not eligible nor are any other communities who were not selected for CD Phase I and Phase II Year 1 funding. Phase II Year 2 is not a guaranteed allocation. See the “Threshold Requirements” within the Appendix: (<http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/annual-action-plan>) for specific thresholds that are also considered in determining eligibility.

Grantees with open CD Category awards cannot apply within the Public Works and Water Wastewater categories.

Phase I Selection Criteria Matrix

The Matrix below describes each selection criteria as a numerical score within the CD Category. The maximum number of points available within any application is 1,025 points. A minimum score of 400 points is required and some criteria require a minimum score as noted below. All selection criteria will be scored in five-point increments and shall be scored on a scale.

Selection Criteria Summary	Maximum	Threshold Minimum
Project Need	200	100
Project Impact	200	100
Project Readiness	200	100
Community Support	200	100
Match & Leverage	50	-
Municipal Equalization Fund (MEF) Score	100	-
Achievements	75	-

Total	1,025 points	400 points
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Phase II Selection Criteria Matrix

The Matrix below describes each selection criteria as a numerical score within the CD Category for Phase II (Implementation). The maximum number of points available within any application is 800 points. A minimum score of 400 points is required and some criteria require a minimum score as noted below. All selection criteria will be scored in five-point increments and shall be scored on a scale.

Selection Criteria Summary	Maximum	Threshold Minimum
Project Design	300	150
Project Readiness	200	100
Community Support	200	100
Subtotal	700 points	350 points
On-Site Review	100	50
Total	800 points	400 points

Additional information regarding threshold requirements and eligible activities can be found within the Appendix, and also within the Comprehensive Development Program Application Guidelines, found at: <http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

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 CD Category 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 will be available in the Appendix and the DED website at: <http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

Describe how resources will be allocated among funding categories.

It is anticipated that \$2,500,000 in CDBG funds will be utilized for CD Phase II (Implementation).

Describe threshold factors and grant size limits.

The Housing and Community Development Act 1974 objective funds use is for activities that primarily benefit low and moderate-income persons. Application activities are required to meet CDBG National Objective of benefit to low-moderate income persons (LMI) as a threshold for review and funding consideration.

All activities proposed in applications for CDBG funding in the CD 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). A project or project activity that fails to meet of the LMI national objective is ineligible.

The maximum grant amount for CD activities was \$30,000 for Phase I (pre-development), and was funded during the previous Program Year. Up to \$780,000 is available for Phase II (implementation) with \$350,000 being provided during the first allocation of implementation funding and \$430,000 being provided for the second allocation of funding.

During the 2018 Program Year, CD projects must benefit low- to moderate-income residents of the community, primarily those residing within a CD target area. The cost per resident beneficiary for infrastructure (PW eligible activities) cannot exceed \$3,000. Recipients of CD resources are not required to use any of their award for General Administration, nor for either Construction Management or Housing Management.

For all non-administrative costs, Phase I and Phase II require a 25% match and 25% leverage. Phase I (pre-development) non-administrative costs are those not associated with General Administration activities. For Phase II, non-administrative costs are those not associated with General Administration, Housing Management, and/or Construction Management. General Administration, Housing Management, and/or Construction Management do not require local match or leverage for the CD project during Phase II.

Match may include public and private funds, or in-kind services, such as materials, labor, or other items that are CDBG-eligible and directly related to the project. 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 either match or leveraged funds. For example, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions.

Proposed leverage must be from CDBG-eligible activities directly related to the proposed project(s) in the same target neighborhood or directly benefiting a substantial majority of the LMI persons or families residing within the neighborhood during the grant award period. Consideration for leverage will be given for such sources as public and private funds, loans, other non-CDBG grants, and program income from prior awards.

For Phase I, General Administrative activities may not exceed 10% of the amount of CDBG funds awarded or \$3,000, whichever is the greater amount.

Within Phase II (Year 1 and 2, respectively):

The General Administration activity cannot exceed \$35,000 or 10% of the CDBG grant award, whichever is less. The Housing Management activity cannot exceed 10% of housing activity project costs or \$35,000 whichever is less. The Construction Management Activity cannot exceed \$10,000. These amounts are in addition to the CDBG CD funds grant award for CDBG CD project activities in each city. General Administration, Housing Management, and Construction Management activities require no matching funds.

Recipients of CD resources are not required to use any of their award for General Administration, Housing Management or Construction Management.

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

Additional comprehensive development efforts, particularly those targeted towards residential neighborhoods will improve and revitalize neighborhoods within communities throughout the state.

STATE PROGRAM NAME: 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 within the Downtown Revitalization Program for activities that will contribute to the revitalization or redevelopment of downtown infrastructure, health and safety concerns, and develop a greater capacity for growth. This provides a sound basis for fostering local economic development. This recognizes the importance of the condition and viability of a downtown to increase the community's tax base and create a center for community activity, which is directly related to business expansion and location decisions. Activities will assist communities to carry out a comprehensive downtown revitalization pre-development study to stabilize and enhance clearly defined downtown areas that will provide a benefit to low/moderate income residents of the community or aid in the elimination of substandard or blighted structures and areas in the downtown as part of meeting CDBG National Objective criteria.

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

Each DTR project will be completed first through a pre-development planning process for which CDBG Planning Category resources may be used. Project implementation follows. Applicants interested in applying for the pre-development phase would do so by applying within the CDBG Planning cycles.

DTR resources are for implementation of the project; such funds become available to the applicant upon successful completion of the requirements of a downtown revitalization pre-development study. The study must be made available to the DED prior to, or along with the application for DTR resources. A summary of the planning and implementation process undertaken and/or underway is a required component of the application.

The maximum grant amount for downtown revitalization implementation activities will be \$445,000. For the current Program Year, \$2,000,000 in CDBG funds are anticipated for Downtown Revitalization category eligible activities, which is comprised of an estimated \$1,000,000 allocation, and \$1,000,000 in prior year resources. For information on the maximum grant amount for pre-development studies, please see the 2018 Planning Application Guidelines.

Eligible applicants include every Nebraska incorporated municipality with a population of less than 50,000 persons and are not a CDBG Entitlement Community (including Omaha, Lincoln, Bellevue, and Grand Island). See the "Threshold Requirements" within the Appendix,

<http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/annual-action-plan> for specific thresholds that are also considered in determining eligibility.

Below is the Selection Criteria Matrix that will be used for the DTR Program Category for Phase II (Implementation). The Matrix describes each selection criteria as a numerical score within the DTR program category. The maximum number of points available within any application is 1,025 points. A minimum score of 400 points is required and some criteria require a minimum score as noted below. All selection criteria will be scored in five point increments and shall be scored on a scale.

DTR Scoring Criteria Matrix:

Selection Criteria Detailed Matrix – CDBG DTR Category		
Item	Criteria	Points Possible
1. Project Design <i>(threshold: 150 points)</i>		300
	Overall Purpose of Project (Need)	125
	Project Impact	125
	Past efforts to resolve the problem	50
2. Project Readiness <i>(threshold: 100 points)</i>		200
3. Business & Community Support <i>(threshold: 100 points)</i>		200
4. Matching Funds		50
5. Municipal Equalization Fund (MEF) Score		100
6. Achievements		75
	Economic Development Certified	50
	DED Leadership Community	50
	Organizational preparedness	25
	Subtotal <i>(threshold: 350)</i>	925
7. On-site Review <i>(threshold: 50 points)</i>		100
	Total points <i>(minimum threshold 400)</i>	1,025

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

As noted above within the description of the criteria used to select applications, this information was a summary of the criteria. Complete information regarding the application criteria will be made available within the Downtown Revitalization Program Application Guidelines. The Guidelines 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:

<http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

Describe how resources will be allocated among funding categories.

It is anticipated that \$2,000,000 in CDBG funds will be utilized for project implementation (Phase II).

The total CDBG maximum grant amount equals \$445,000, which includes the maximum of \$400,000 for project activities, a maximum \$35,000 for general administration activity, and a maximum of \$10,000 for construction management activity. The Housing Management activity cannot exceed 10% of housing activity project costs or \$35,000 whichever is less of the CDBG grant award.

Describe threshold factors and grant size limits.

The Housing and Community Development Act 1974 objective funds use is for activities that primarily benefit low and moderate-income persons. Application activities are required to meet CDBG National Objective of benefit to low-moderate income persons (LMI) as a threshold for review and funding consideration.

All activities proposed in applications for CDBG funding in the DTR Category must meet one of the national objectives of (1) benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit, LMI Limited Clientele, or LMI Housing. A project or project activity that fails to meet one of these specified national objectives is ineligible.

DTR applicants are not required to obtain designation as neither an Economic Development Certified Community nor a Leadership Certified Community. Participation in these programs is encouraged as several of the required programmatic processes provide innumerable benefits to a community, enhancing DTR applications directly and indirectly through the effort undertaken to become certified.

The maximum grant amount for pre-development (previously known as “Phase I”) is identified within the Planning Category Application Guidelines. Planning activities are no longer eligible under the DTR Category.

The maximum grant amount for DTR implementation (previously known as “Phase II”) activities will be \$445,000 per community. All costs for project activities require a 25% match. No more than half of the total project match may be in-kind source contributions. At least half of the total project match must

include non-CDBG cash contributions, of the total DTR project costs less costs associated with General Administration, Housing Management, and Construction Management.

The total DTR maximum grant amount equals \$445,000, which includes the maximum of \$400,000 for project activities, a maximum \$35,000 for general administration activity, and a maximum of \$10,000 for construction management activity. The Housing Management activity cannot exceed 10% of housing activity project costs or \$35,000 whichever is less.

As it relates to Davis Bacon and Related Acts (DBRA) compliance, Recipients of DTR resources are not required to use any of their award for General Administration, Housing Management, or Construction Management.

Proposed match must be from 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.

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 Construction Management activities do not require any matching funds.

Additional information regarding threshold requirements and eligible activities can be found within the Appendix: <http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/annual-action-plan> and also within the DTR Program Application Guidelines.

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: Economic Development (ED)

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 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.

Eligible activities will generally include:

- 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

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

Eligible applicants include every Nebraska incorporated municipality that is under a population of 50,000 persons. Every county in Nebraska is also eligible for the Program. The CDBG entitlement communities of Omaha, Lincoln, Bellevue, and Grand Island are not eligible.

A summary of the ED Program criteria include a number of items, much of which is noted below. Additional criteria include the following:

The business must pay all employees at the project location in Nebraska at a rate of no less than \$10.50 per hour, as well as provide appropriate employee benefits, for the duration of the project job maintenance period (this period will be established as part of the Memorandum of Understanding (MOU) for the project).

Non-profit businesses/organizations are ineligible. Businesses that derive any revenues from gaming are ineligible.

Production agriculture enterprises are ineligible. These are excluded because they lack the necessary CDBG ED Program Guideline requirement that there must exist extra levels of substantial and separately identifiable value-added processing being performed by employees of the production agriculture

enterprise—beyond those tasks and activities of production, harvesting, and marketing normally associated with traditional agricultural production commodities. Examples of such ineligible enterprises (when they lack the extra value-added component) include: grain farming, livestock raising, raising of poultry or the production of eggs, the production of milk, fruit or nut orchards, vegetable farming including hydroponics vegetable production, and aquacultural facilities.

Trucking enterprises, which lack the requisite storage, warehousing, or distribution extra components which would distinguish them from the usual so-called "rolling stock" enterprises, are ineligible.

The general scoring criteria for the Program include 110 points available for any application. These criteria include: CDBG Funds Utilization; Community Impact and Investment; Business Factors; Economic Development Certified Community, and/or DED Leadership Community. Additional information will be noted within the 2018 Annual Action Plan Appendix.

This information provided is a summary. Additional information will be available within the Appendix and within the Economic Development Program Application Guidelines.

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

As noted above within the description of the criteria used to select applications, this information was a summary of the criteria. Complete information regarding the application criteria will be made available within the CDBG Economic Development Application Guidelines. The Guidelines 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:

<http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

Describe how resources will be allocated among funding categories.

For the 2018 Program Year, DED is considering funding economic development infrastructure activities/projects with the anticipated \$2,000,000 of funding allocated to this Program. The estimated \$2,000,000 is comprised of an estimated \$1,000,000 allocation and \$1,000,000 of prior year resources. Other activities/projects will be funded from DED's State CDBG Revolving Loan Fund.

Describe threshold factors and grant size limits.

The Housing and Community Development Act 1974 objective funds use is for activities that primarily benefit low and moderate-income persons. Application activities are required to meet CDBG National

Objective of benefit to low-moderate income persons (LMI) as a threshold for review and funding consideration.

All activities proposed in applications for CDBG funding in the ED Category must meet the national objective of benefitting low-and moderate-income persons. A project or project activity that fails to meet of the LMI national objective is ineligible. The LMI benefit is demonstrated in nearly all ED projects through job creation, job retention, or both job creation and job retention, by a benefited business. Such job creation or job retention must involve the employment of persons, the majority (51% or more) of whom are LMI persons.

The total ED maximum grant amount equals \$1,015,000, which includes maximums of \$1,000,000 for project costs, \$5,000 for general administration activity, and \$10,000 for construction management.

All ED projects require a minimum 1:1 match of CDBG funds with funds from other (non- CDBG) sources. This means that CDBG funds can be no more than 50% of the total project cost. General administration and construction management activities do not require local match.

The Housing and Community Development Act (HCDA) and HUD's CDBG regulations outline basic project "underwriting" guidelines/standards so that State programs administering federal CDBG funds will achieve the federal objectives of the CDBG Program. The underwriting standards—the decision-making criteria—used in the Nebraska ED Program are designed to address these federal guidelines. Further information regarding the “decision-making criteria” and other information on the ED Program will be available within the Appendix (<http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/annual-action-plan>). Additional information will also be available with the Economic Development Application Guidelines.

In addition, not all businesses are eligible to be benefited businesses under the DED CDBG ED Program. For a business to be eligible to be a benefited business, that business must:

- meet the definitional criteria to be a "qualified business" as that term is defined in the Nebraska Advantage Act, as that Act exists at the time an eligibility determination is made under these guidelines;
- also meet any additional eligibility criteria, and not be ineligible by reason of the exclusions, in the ED Program Application Guidelines and above mentioned information.

Additional information regarding the Nebraska Advantage Act Criteria will be provided within the Appendix (<http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/annual-action-plan>).

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: 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) under the Nebraska Affordable Housing Program application criteria. An organization receiving funds under the CHDO Operating Cycle, cannot also receive a grant under the CHDO Activity set-aside.

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 Operations 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 for all eligible applications. The highest scoring two applications will be recommended for award, with a grant maximum of \$50,000, as long as the grant is not more than 50% of the CHDO's total operating expenses within that fiscal year

(this also includes organizational support and housing education provided under section 233(b)(1) and (2) of the Act, as well as funds for operating expenses provided under §92.208). The application deadline will be September 28, 2018.

If awarded a CHDO Operating grant, the CHDO organization will be expected to have the capacity to have a CHDO Project within 24 months from receiving the CHDO Operating grant.

Applications will have to score at least 200 total points on the application to be funded during the 2018 HOME CHDO Operating Cycle.

Below is the Scoring Criteria Matrix that will be utilized within the HOME CHDO Operating Category for applications.

SELECTION CRITERIA MATRIX	
Criteria	Points Possible
Need/Impact/Sustainability	150
Collaboration	100
Readiness/Capacity	100
Financial Management	150
Total Possible Points	500

Complete application guidelines information will be made available within the CHDO Operating Application Guidelines section. The Guidelines 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/community-development-block-grant/>

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.

HOME resources in the amount of \$150,000, will be available for the CHDO Operating, with \$100,000 for CHDO Operating Application Cycle and \$50,000 available in the CHDO Activity 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 for all eligible applications. The grant maximum of \$50,000, as long as the grant is not more than 50% of the CHDO's total operating expenses within that fiscal year. This also includes organizational support and housing education provided under section 233(b)(1) and (2) of the Act, as well as funds for operating expenses provided under §92.208.

If there are not enough projects to fund in the HOME CHDO Operating category, funds may be moved to another HOME funding category to assure 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 maximum amount of HOME funds available within the CHDO Operating Cycle will be \$100,000, with a grant maximum of \$50,000; and \$50,000 available in the CHDO Activity Application Cycle, with a grant maximum of \$25,000, as long as the grant is not more than 50% of the CHDO's total operating expenses within that fiscal year. This also includes organizational support and housing education provided under section 233(b)(1) and (2) of the Act, as well as funds for operating expenses provided under §92.208.

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

The HOME CHDO Operating Program will build capacity for more non-profit organizations to undertake CHDO eligible projects. Therefore, building the capacity of additional non-profit organizations will also provide that these non-profits are capable of creating and developing more affordable housing projects across the state.

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 activities throughout the state and made available to eligible non-profits that are certified/recertified as Community Housing Development Organizations (CHDOs) under the Nebraska Affordable Housing Program application criteria. An organization receiving funds under the CHDO Activity set-aside, cannot receive also receive a CHDO Operating Grant.

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 for all eligible applications. The two highest scoring applications will be recommended for award, with a grant maximum of

\$225,000, and organizational operating maximum of \$25,000. The application deadline will be September 28, 2018.

Applications will have to score at least 200 total points on the application to be funded during the 2018 HOME CHDO Cycle.

Below is the Scoring Criteria Matrix that will be utilized within the HOME CHDO Category for applications.

Selection Criteria Matrix	
Criteria	Points Possible
Need / Impact	75
Project Financing & Credit	125
Collaboration	50
Capacity / Readiness	125
Financial Management	125
Total Possible Points	500

Complete application guidelines information will be made available within the CHDO Application Guidelines section. The Guidelines 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 CHDO Cycle.

Describe how resources will be allocated among funding categories.

HOME resources in the amount of \$450,000, will be available for the CHDO Program 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 for all eligible applications. The two highest scoring applications will be recommended for award, with a grant maximum of \$225,000, and organizational operating maximum of \$25,000.

If there are not enough projects to fund in the HOME CHDO project category, funds may be moved to another HOME funding category to assure 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 maximum amount of HOME funds available within the CHDO Cycle will be \$450,000, with a grant maximum of \$225,000, and organizational operating maximum of \$25,000.

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

Through the HOME CHDO Program additional housing units that will be occupied by LMI persons throughout the state. The additional number of affordable housing units will be quantified within the Annual Performance 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 a joint application process 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 percent tax credits (and may use 4 percent tax credits for a bond structured project) 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 Omaha, Lincoln, Bellevue, and Grand Island.

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, CHDOs, 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. The complete application can be found on NIFA's website at: <https://www.nifa.org/res-dev/application>

Describe how resources will be allocated among funding categories.

The 2018 HOME total allocation distribution estimate of \$2,700,000, in addition to \$1,226,053 in prior year resources, making a total of \$3,926,053 that will be distributed among the following funding categories (if there are not enough projects to fund in the HOME Rental category, funds may be moved to another HOME funding category to assure timely allocation of funds):

- \$3,326,053, which is comprised of \$2,100,000 estimated 2018 allocation and \$1,226,053 in prior year resources, in HOME resources will be utilized for LIHTC rental housing development.
- \$300,000 in HOME resources will be utilized for HOME state administration, operations, and technical assistance in addition to the estimated \$3,926,053, that will be distributed.
- A minimum of \$637,500 of the NAHTF allocation will be committed as HOME Match to meet the 2018 HOME Match requirement of 25% for Nebraska for the \$2,550,000 in non-administration funds. There is \$1,226,053 in prior year resources which has already had required 25% HOME Match applied, therefore no further Match is added here. Total HOME Funds for 2018 will be \$3,776,053, which will be used within the tax credit application cycles. This does not include the \$150,000 for CHDO Operating Program.
- \$450,000 in HOME resources will be utilized for CHDO projects (15% of the 2018 HOME total allocation of \$3,000,000)
- \$150,000 in HOME resources will be utilized for CHDO organizational operations (5% of the 2018 HOME total allocation of \$3,000,000. \$100,000 will be available for a CHDO Operating Application Cycle and \$50,000 will be available in the CHDO Activity Application Cycle.

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, CHDOs, 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 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 at least 20 years.

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, and rental application fees); housing information services and resource identification; and for the purchase of a case management software system utilizing HOPWA carryover funds from the previous year as well as Ryan White Part B monies. The case management software system will be utilized by both HOPWA and Ryan White Part B Program staff and the project sponsor. Some resource development monies will be put towards a Provider Survey addressing healthcare and housing, a joint effort amongst several programs within the DHHS Infectious Disease Unit.

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.

In general, 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 (7) 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 (NHCP) which consists of HIV/AIDS medical providers, service providers, consumers, and other members of

the public. One of the members of the NHCPC includes a representative of the Nebraska Red Ribbon Community. The Nebraska Red Ribbon Community is a geographical, diverse group of persons living with HIV/AIDS that work together to enhance and enrich the lives of fellow HIV positive persons through leadership and partnership with the State and other local organizations. In addition, the HOPWA Program Manager works closely with the Ryan White Part B Program Manager, the ADAP Coordinator 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 Manager is currently in the process of developing a Quality Management Plan for the HOPWA Program and will align goals with that of Ryan White Part B Quality Management Program and Plan. The HOPWA Program is working with the Nebraska

Housing Developers Association (NHDA) to resume RentWise training to HOPWA clients across the state, and the HOPWA Program Manager was certified to train RentWise in May of 2016.

Client services staff will complete the 'HOPWA TBRA Waiting List Application' for any client in potential need of the TBRA Program and submit the completed application to their immediate supervisor.

Reviewers, consisting of Client Services Managers, Executive Director, and Compliance Supervisor, will review and discuss all applications received within four business days to determine if client/household meets criteria to be placed on the TBRA waiting list. The criteria for placement onto the TBRA waiting list constitutes falling into a range of the highest number of points the client/household receives on the 'HOPWA TBRA Waiting List Application' with the range being 8-26. The top five highest scoring clients/households from the HOPWA TBRA Waiting List Application and review process will be added every time there is an opening of available TBRA slot(s).

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 currently 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. Requirements of the contract with Nebraska AIDS Project include their ability to provide case management and supportive services to eligible HOPWA clients, to coordinate provision of assistance with state and local

governments and other public and private organizations and agencies, to ensure confidentiality, to have 'affirmative outreach procedures' to ensure that all persons who qualify for assistance know of the program, to conduct ongoing programmatic and financial monitoring and maintain reporting requirements, and to have at least one employee obtain a certificate of completion of the 'Getting to Work' training curriculum, at least one obtain a certificate of completion of the 'HOPWA Oversight' training curriculum and at least one obtain a certificate of completion of the 'CPD Financial Management' training curriculum.

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.

\$472,461 in HOPWA funds are estimated as being available with the 2018 Program Year for distribution. 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 FY2018

Formula Administrative-\$12,662
Supportive Services-\$10,000
Housing Information-\$12,000
Resource Identification-\$16,000
Short-term Rent/Mortgage-\$12,500
Long-term Rent-\$23,500

NAP HOPWA FY2018

Formula Administrative AID-\$21,945.56
Supportive Services AID-\$130,840.22
Permanent Housing Placement AID-\$20,000.00
Resource Identification AID-\$16,489.51
Short-term Rent/Mortgage AID-\$79,617.76
Long-term Rent AID-\$131,517.76

HOPWA TOTAL: \$487,073**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: 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 and made available to extremely low-income (ELI) persons on an area basis.

Eligible applicants may submit applications based one of three application types that include:

Nebraska will reserve a portion of the State's annual HTF allocation to affordable rental, multi-family projects in coordination with Nebraska Investment Finance Authority (NIFA) through the joint DED/NIFA application for low income housing tax credit applications within the Collaborative Resource Allocation for Nebraska (CRANE) application cycle. This allocation will be referred to as the "CRANE 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 pilot 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.

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.

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, and manage and operate an affordable multifamily rental housing development.

The Nebraska DED 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 ELLI; 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.

Selection Criteria Matrix		
Criteria	Points Possible	Points Awarded
Geographic Diversity	10	
Ability to Obligate Funds	10	
Timeliness	10	
Project Based Rental Assistance ELI	10	
Affordability Period	10	
Priority Housing Needs	10	
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.

For the 2018 Program Year, DED anticipates utilizing \$2,700,000 of funding allocated to this Program for project activities. In addition, there is \$4,539,486 prior year resources, allowing for \$7,239,486 HTF funds available during the 2018 Program Year for project activities.

1. Nebraska will reserve a portion of the State’s annual HTF allocation to affordable rental, multi-family projects in coordination with Nebraska Investment Finance Authority (NIFA) through the joint DED/NIFA application for low income housing tax credit applications within the Collaborative Resource Allocation for Nebraska (CRANE) application cycle. This allocation will be referred to as the “CRANE Set Aside”.

For 2018, the amount available to multi-family projects in CRANE will be **\$639,486**.

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 pilot 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”.

For 2018, the amount available for a HTF Special Needs project will be **\$2,100,000**.

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.”

For 2018, the amount available for permanent housing will be \$4,500,000 and include:

\$1,500,000 within the Omaha Continuum of Care;

\$1,500,000 within the Lincoln Continuum of Care; and

\$1,500,000 within the Balance of State (BoS) Continuum of Care.

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

The above mentioned amounts reflect the estimated allocation of \$2,700,000, the \$4,539,486 prior year resources, allowing for for a total estimated amount of \$7,239,486 in HTF resources for project activities. The remaining \$300,000 in funds will be used by the State for planning and administration. There is also an additional \$300,000 of state administration prior year resources which will also be used

by the State for planning and administration, totaling \$600,000 in state administration for the 2018 Program Year.

Describe threshold factors and grant size limits.

Eligible Recipients 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, a recipient 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 7 housing selection criteria, and includes the following information, unless waived by Nebraska 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 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 NDED-provided forms for current year application will be posted on the NDED 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 NDED 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. For the CRANE Set Aside, up to \$639,486 in HTF funds can be accessed. For the Special Needs Set Aside up to \$2,100,000 in HTF may be accessed, and in the Permanent Housing Set Aside up to \$1,500,000 can be used within the Omaha CoC; \$1,500,000 in the Lincoln CoC; and \$1,500,000 within the Balance of State CoC.

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 times 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/grow-your-community/data-for-applicants-and-grantees/>

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: 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 Need, influences 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.

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

In an attempt to reduce NHAP grant management and administrative burden, 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.

Grant year 2018-2019 is the 1st year of this two-year grant cycle, which is an open competition year. Renewing and new NHAP applicants will submit a full application which includes information on the applicant's experience, strategies for meeting federal program requirements, fiscal stability, performance outcomes from the previous year and narratives relating to the need of the program in their community, collaboration with other homeless providers, and projected outcomes for the

individuals they plan to serve. Reviews teams then score based on the submitted information in comparison to the scoring criteria tool. Agencies that have not been funded through NHAP in the previous funding cycle will not be able to report out the full data requested in the NHAP application; however, the HMIS lead (CCFL) has been developing other types of performance reports to allow overview of performance measurement factors. One new report that is being reported for FY18 is data on the percentage of individuals who have exited homeless programs to permanent housing and a breakdown on returns to homelessness at 6, 12, and 24 month time periods.

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 is also collaborating 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. Applications and monitoring results are reviewed by an impartial review team each year for final funding determination.

An allocation formula is used in distributing NHAP grant funds. 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 NOFA 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 will be made to reduce the impact of the change in available funding by region. For 2018 funding, NHAP adjusted the formula due to significant changes in the pro rata amounts in some areas of the state few counties in order to provide adequate resources across the State of Nebraska.

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 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. As mentioned above, NHAP utilizes a two-year grant cycle alternating years between the acceptance of only renewal applications and acceptance of new and/or renewal applications.

Describe how resources will be allocated among funding categories.

ESG funds will be allocated among several service categories. The Table below further describes the breakdown of estimated allocations for each of the ESG Categories in order to ensure that no more than 60 percent of the total ESG award is allocated to Street Outreach (SO) and Emergency Shelter (ES) services. Based on the ESG allocation estimate, SO and ES services must be below \$565,088, which is 60 percent of the total ESG funds, which is \$941,814 for PY2018.

In the event that Nebraska does not receive the estimated funding from HUD, NHAP will adjust for the difference with HSATF funding to align with the NHAP allocation announcement. Through the planning process, NHAP has allocated reserve funding in the event that the ESG funding is less than anticipated. Conversely, if the ESG award is greater than expected, NHAP has the ability to carryover HSATF for reallocation in the next fiscal year.

Service	Estimated ESG Funds
Street Outreach (SO)	\$4,965
Emergency Shelter (ES)	\$164,544
Maximum SO & ES Subtotal (no more than 60% of Estimated Total Award)	\$169,509
Homelessness Prevention	\$381,712
Rapid Re-housing	\$202,648
HMIS	\$117,309
Services Subtotal	\$701,669
Estimated Administration (7.5%)	\$70,636
Total ESG Award	\$941,814
Service	Estimated ESG Funds

Describe threshold factors and grant size limits.

At present, DHHS does not have grant limits 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 there are no threshold factors for funding other than those identified in the RFP.

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

Through ESG and HSATF resources needed services will be provided to persons who are homeless or at risk of homelessness throughout the state. For the upcoming program year, utilizing last year’s data, NHAP anticipates that 452 households will be assisted with tenant-based rental assistance/rapid rehousing; 7,224 homeless persons will be assisted with overnight shelter; and 1,483 persons will be assisted with homelessness prevention. However, in the current application cycle for the program period covering 7/1/18 through 6/30/19, NHAP has encouraged the expansion of Rapid Rehousing programs to efficiently move individuals from homeless into permanent housing programs. NHAP requires all subrecipients to comply with the Coordinated Entry system to prioritize those individuals with the highest needs to appropriate housing programs. Subrecipient agencies will be monitored for adherence to the Housing First model and use of the Coordinated Entry system. With these parameters, it is expected that agencies will request additional funding for the Rapid Rehousing service which will result in a higher number of individuals served through this type of service with a continued reduction in the allocations for emergency shelter.

STATE PROGRAM NAME: Planning (PP)

Funding Sources: CDBG funds

Describe the state program addressed by the Method of Distribution.

CDBG funds will be utilized within the Community Development Priority, by a local unit of government to provide community planning, fair housing studies, strategic planning, and functional or special studies. Functional and special studies may be related to such areas as housing, infrastructure, economic development, land use/regulatory measures, main street improvement district, energy conservation, transportation planning, environmental planning, heritage tourism studies, and historic preservation studies, in compliance with CDBG regulations. During the 2018 Program Year, projects must fulfill the LMI National Objective criteria.

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

CDBG funds will only be available for applicants that are CDBG-eligible units of general local government. Specific application questions have been developed, which include: project need, impact, readiness, National Objective, local matching funds, Healthy Community Design, and additional points are available for achievement language specifically addressing in the plan/study: Energy Efficiency; Reduction of Inefficiencies; Environmental Stewardship. The total points available for any given application will be 1,050 points; a minimum of 480 points is required in order to be considered for funding. In addition, applicants will be required to obtain a minimum score within the project need, impact, readiness, and healthy communities design sections, and must meet all the threshold requirements, in order to be scored and considered for an award recommendation. In addition, failure of the Applicant to score a minimum number of total points on the application will result in the Application not being funded.

Below is the Selection Criteria Matrix that will be used for the Planning Category.

Selection Criteria	Maximum	Threshold Minimum
Project Need (Problem Statement)	250	150
Project Impact	250	150
Project Readiness (Local Effort)	250	150
Matching Funds	50	-
LMI Benefit	50	-
Municipal Equalization Fund (MEF) Score	100	-
Healthy Community Design and/or documented health/walkability Community Achievements	50	30
Achievements: Energy Efficiency; Reduction of Inefficiencies; Environmental Stewardship	50	-
Total	1,050 points	480 points

1. Project Need (Problem Statement): Up to 250 points is possible. A minimum of 150 points in this section is required in order to meet threshold. Describe the existing or imminent problem and/or an assessment of the identified local need for the project. The significance of the project need will be scored as compared to other applicants. The narrative should reflect the current need for the proposed project based on existing, identifiable problems and conditions; identify any past formal or informal planning efforts to resolve the problem; and demonstrate the capacity and commitment to successful completion of the project. Solutions to the problem need should include no action.

Points in this section include:

- 0-75 points—inadequately defined, below average
- 80-150—reasonably defined, average compared to other applicants
- 155-250—well-defined, above average

The application narrative shall be scored for clear and concise explanations of: (a) the overall purpose of the project and factual information that illustrates the severity of identified problems in community; (b) demonstration of the capacity and commitment to successfully implement changes or project as a result of the planning process; (c) past efforts (planning or otherwise) to resolve the problem and meet community needs.

2. Project Impact: Up to 250 points possible. A minimum of 150 points in this section in order to meet threshold. Describe the importance of project activities to the community and provide clarity on how the project will benefit those identified by a CDBG National Objective. For this criteria, it is necessary to create a nexus between the project need and the project outcomes as proposed. The significance of the project impact will be scored as compared to other applicants.

Points in this section include:

- 0-75 points—inadequately defined, below average
- 80-150—reasonably defined, average compared to other applicants
- 155-250—well defined, above average

The application narrative shall be scored for clear and concise description of: (a) clearly defined goals and objectives to address the identified community problems; (b) how the completed planning activities will benefit the community, especially low and moderate-income and special needs persons; (c) the proposed project outcome in measurable units, the degree to which these accomplishments within project implementation (after plans have been completed) will reduce or eliminate the need(s), and any plans to eliminate what needs remain; (d) the alternatives considered to address the need(s) and the rationale for selecting the proposed solution; and (e) indication of whether there has been a formal study/report completed that recommends the proposed solution, and if so, who completed it and when.

3. Project Readiness (Local Effort): Up to 250 points possible. A minimum of 150 points in this section in order to meet threshold. A description of prior and concurrent efforts related to the overall: planning strategy; work plan for solutions to the problems/needs and impact as defined above; project readiness; and financial and operational capacity of the community. Project readiness will be scored as compared to other applicants.

Points in this section include:

- 0-75 points—inadequately defined, below average
- 80-150—reasonably defined, average compared to other applicants
- 155-250—well defined, above average

The application narrative shall be scored for detailed: (a) description of the planning activities and methodology for achieving the goals and objectives as outlined under the Project Impact section; (b) work plan and narrative that lists and describes the activities and tasks, time frames, products, or outcomes, and key parties responsible for completing each activity; and (c) description of citizen participation process, specifically the outline and scheduling (timeline) of how broad-based community involvement/awareness will be utilized throughout the project.

4. *Matching Funds*: Up to 50 points is possible. No minimum points in this section are required in order to meet threshold. Applicants that commit local funds (including “other” funds and or in-kind contributions) to the project’s non-administrative activities that exceed the required match will be eligible for additional points under the appropriate category of the selection criteria matrix. The table below further describes these criteria.

Matching Funds Exceeding Requirements	Points Available
10% or greater	50
5-9.99%	25
3-4.99%	10
Less than 3%	0

5. *LMI Benefit*: Up to 50 points is possible. No minimum points in this section are required in order to meet threshold. This scoring category is designed to give points to communities with higher concentrations of LMI persons. Communities with an LMI population of 55% or more will receive 50 points. Communities with a LMI population less than 54.99% will receive no points in this section. Narrative is not required under this section.

6. *MEF*: Up to 100 points possible. A Municipal Equalization Fund (MEF) score will be generated for each community that has applied for this program category. This aid formula provides a way of looking at needs and resources while at the same time ensuring that local governments provide a level of local

resources. DED will incorporate the MEF calculation into the scoring criteria for this program category. Narrative is not required under this section.

7. Healthy Community Design: Up to 50 points possible. 30 minimum points required. Points will be awarded in this section for applicants that demonstrate how planning projects will address and incorporate what goals the community holds, or actions it will take that will integrate healthy community design into the comprehensive plan, housing study, transportation study, downtown revitalization study, or other special study funded with CDBG dollars. The application should consider alternative solutions, such as when addressing “1. Project Need,” which includes the solution of “no action.” If the applicant determines that it the CDBG project cannot include healthy design in the main project need in some manner, then this is where that discussion is discussed and justified. If the alternative solutions documentation is completed with the community and “no action” is determined, the applicant will have still fulfilled the requirement. The requirement is that the planning concept of Healthy Community Design is considered through the community engagement process and if applicable, the planning process for this CDBG planning project. The long-term objective is for Nebraska communities to be aware of and be given the tools for investigating how their unique community needs may include solutions derived at least in part from Healthy Design planning concepts and tools.

The most recent “Healthy Communities Policy Guide” of the American Planning Association, states that “A healthy community, as a concept and goal, may have varying meanings depending on the purpose and mission of the organization.” In addition, the APA states, “healthy communities are defined as places where all individuals have access to healthy built, social, economic, and natural environments that give them the opportunity to live to their fullest potential regardless of their race, ethnicity, gender, income, age, abilities, or other socially defined circumstances.” Applicants may review and utilize the information in the current APA guide at:

<https://www.planning.org/policy/guides/adopted/healthycommunities/> when addressing and describing how this threshold item is met within the CDBG Planning Project application.

As an alternative to including healthy design discussion in the community engagement process, applications may fulfill the requirement by listing Achievements associated with healthy design concepts or local walkability initiatives. This may include a description of local priorities such as community design standards, coalitions, or policies that may positively impact the physical infrastructure, safety, health and social services, social cohesion, or economy of the community which are associated with People Living Better Lives. Demonstration of these elements can be, but are not limited to:

- Mayor's Bicycle and Pedestrian Coalitions
- Park and Recreation Plans
- Trail Plans
- Walkability, Bikeability and Transit Studies
- Complete Streets Elements including policies
- Safe Routes to School Programs
- Regional Bike/Pedestrian Plans

8. Achievements: Energy Efficiency; Reduction of Inefficiencies; Environmental Stewardship, Universal Design: Up to 50 points possible. No minimum point required in order to meet threshold. Points will be awarded in this section for applicants that demonstrate how planning projects will address sustainability concerns by (a) promoting energy efficiency throughout the community and project area; (b) reduction of inefficiencies throughout the community in relation to: budget, operations, and project implementations; (c) promote environmental stewardship; and (d) utilize universal design concepts.

The above mentioned information is a summary. Additional information on the Planning Category will be made available within the Appendix.

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

As noted above within the description of the criteria used to select applications, this information was a summary of the criteria. Complete information regarding the application criteria will be made available within the CDBG Planning Application Guidelines. The Guidelines 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:

<http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

Technical assistance is available from the State during preparation of the application to ensure that the application will meet threshold requirements. Application guidelines are available as a downloadable document on the Department website or may be acquired by contacting the program representative.

Describe how resources will be allocated among funding categories.

\$350,000 in CDBG resources will be available for the CDBG Planning Category.

In addition to the maximum of \$40,000/community or unincorporated county and \$60,000/multi-community, county-wide, or regional planning project activities, there is allowed a maximum of \$3,000 or 10% for general administration activity, whichever is less. General administration activities do not require local match.

Describe threshold factors and grant size limits.

Eligible local governments may individually or jointly apply and receive more than one grant per 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. Projects are to be completed within twenty-four (24) months following award.

Milestone Summary	Dates
Planning applications submitted to DED 1st Cycle	August 30 thru September 30
Anticipated Award of 1st Cycle applicants	October
Planning applications submitted to DED 2nd Cycle	Beginning November 15 – Ongoing
Anticipated Award Date of 2nd Cycle applicants	Ongoing

The Housing and Community Development Act 1974 objective funds use is for activities that primarily benefit low and moderate-income persons. Application activities are required to meet CDBG National Objective of benefit to low-moderate income persons (LMI) as a threshold for review and funding consideration.

During Program Year 2018, Planning activities must meet the LMI national objective through benefitting low and moderate-income persons (including on an area basis (LMA), housing (LMH), or serving a limited clientele (LMC).

Planning project proposals must meet threshold requirements reviewed by DED according to the Selection Criteria Matrix. 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 under the Planning Category. Otherwise, an applicant under individual review will be scored according to the selection criteria and must meet the minimum threshold for consideration for approval.

For 2018, no Preliminary Engineering Reports (PERs) that are prepared in anticipation of WWAC funding will be funded through the CDBG Planning Program. PERs that are needed outside of the WWAC process may be funded.

DTR Phase I (pre-development) projects will also be funded within the Planning Category and not within the DTR Category. In 2018, DTR phase I projects must meet the CDBG National Objective of benefitting low to moderate (LMI) income persons in order to receive CDBG funding.

The maximum grant amount for Planning Category activities will be \$40,000 per community/unincorporated county. The maximum grant amount for Planning Category activities will be \$60,000 for multi-community, county-wide, or regional planning projects. Any applications seeking joint/multi-community may be subject to additional requirements. Applicants for such projects should contact the program representative for technical assistance. Planning Category applications that are funded will receive CDBG funds. Applicants are not required to submit an application for the maximum grant amount.

In addition to the maximum of \$40,000/community and \$60,000/multi-community, county-wide, or regional planning project activities, there is allowed a maximum of \$3,000 or 10% for general administration activity, whichever is less.

Planning activities require a 25% match. No more than half (12.5%) of the total project match may be in-kind source or service contributions. At least half (a minimum of 12.5%) of the total project match must include non-CDBG cash contributions, of the total project costs. General Administration activities require no matching funds.

Applicants that commit local funds (including “other” funds and or in-kind contributions) to the project’s non-administrative activities that exceed the required match will be eligible for additional points under the appropriate category of the selection criteria matrix.

ADDITIONAL THRESHOLD AND REVIEW CRITERIA FOR SUBMITTING PLANNING APPLICATION

Eligible local governments may individually or jointly apply and receive more than one grant per cycle in the Planning Category. The local government applicant completing a multi- jurisdictional application must also be a direct participant in the study/project.

The local government applicant 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.

Projects are to be completed within twenty-four (24) months following award.

The following threshold requirements must be met by the local government applicant in order to be eligible for grant resources. These requirements include:

- activities proposed are eligible and comply with CDBG National Objectives and State CDBG priorities;
- applicant has no significant, unresolved audit finding;
- applicant has no known legal actions under way that may significantly impact its capacity;
- applicant is following a detailed Citizen Participation Plan (CPP) and Anti- Displacement Plan;
- applicant has adopted an authorizing participation resolution;
- applicant must have addressed and cleared all substantial compliance problems (i.e. Davis Bacon, acquisition, fair housing, etc.) found during monitoring, if any, from past awarded projects, and have had a response accepted by DED;
- applicant is current with all reporting requirements (semiannual status reports, closeout reports, audit reports, notification of annual audits, etc.); and

- applicant has shown progress (including expenditures) on prior CDBG grants. In general, DED will review projects that have been funded at least 2 years prior to the current Program Year.

The percentage for funds drawn down shall be figured by DED based on the final application acceptance date, except when an applicant is awarded funds after initial award date, obligated and drawn down funds shall be based on a proportionate number of months lapsed since initial grant award. DED shall contact an applicant if additional information is required.

Additional threshold requirements that are specific to the Planning Category include:

- The applicant for a multi-jurisdictional application is a direct participant in the study/project, and cannot serve only as a pass through for CDBG funds or only as the general administrator;
- Multi-jurisdictional applicants are involved with the same project which addresses a common need. The regional study has a product, each municipality or county may have its own product that addresses local recommendations, strategies, or needs as an example; and
- The applicant meets the minimum selection criteria score as noted in this section.
- In addition, during the 2018 Program Year, the applicant will demonstrate how Healthy Community Design is included within the planning process and project.

DED has participated in working with Nebraska DHHS over the years on raising the quality of life of Nebraskans, demonstrated by the two Departments collaborating on the Nebraska State Consolidated Plan. In addition, for a number of years DED has participated and supported the Division of Public Health, Nebraska DHHS, “Nebraska Walkable Communities Initiative.” This initiative is supported by two federal grants from the Centers for Disease Control and Prevention. The primary purpose is on-the-ground success in Nebraska communities in achieving increased walkability and overall health.

DED has served as a member of the steering committee for this initiative for a number of years. The steering committee includes State agencies such as the Department of Transportation, Department of Economic Development, Department of Health and Human Services, Department of Tourism, and the Game and Parks Commission. DED has also been a member of the State Agency Leadership for Walking, Biking, and Active Transportation Committee for over a year, which also includes those Departments. Both committees provide the opportunity for a number of State agencies to discuss how the walkability

initiative of DHHS is associated with program initiatives in other agencies, and how in general the State agencies can work together to support and improve the health and wellbeing of Nebraska communities. This process increases inter-agency communication and efficiency, both programmatically and financially. Discussion and planning focuses on how to work in a more communicative and productive manner across professional disciplines and Departments to raise the quality of life of Nebraskans through public health, transportation, tourism, community development, and economic development projects which positively affect physical health, mental health, safety, educational and economic opportunity and equality of Nebraskans.

DED supports the recent addition of PhysicalActivity - Walkability Priority Initiative to the most recent DHHS business plan as the Grow Nebraska strategy, “Good Life. Great Mission. Helping People Live Better Lives”, which is directly connected to the work done under the walkability initiative of the Division of Public Health, DHHS. The addition of this priority to the DHHS plan allows for the vision of improving physical activity and health of Nebraskans to become a reality through the DHHS program.

In collaboration with these efforts described above, and in support of increasing efficiencies and Growing Nebraska, DED has found one small way of operationalizing the inter-agency Department vision of Helping People Live Better Lives.

The American Planning Association (APA) “believes ‘healthy communities’ are places where all individuals have access to healthy built, social, economic, and natural environments that give them the opportunity to live their fullest potential regardless of their race, ethnicity, gender, income, age, abilities, or other socially defined circumstance.

APA's ***Healthy Communities Policy Guide*** identifies policy ideas for local, state, and federally elected officials aimed at improving community health and quality of living through planning.”

The Guide states, “The conditions in which people live, work, and age have a greater role in a community’s health than individual behaviors and clinical care. Planners and policy makers influence these determinants of health through decisions such as, land use, urban design, and transportation, which affect local air quality, water quality and supply, transportation safety, and access to physical activity, healthy food, and affordable housing, among many other quality of life indicators.”

“The Healthy Communities Policy Guide addresses challenges derived from our built, social, and natural environment, provides recommendations for policies to address the social determinants of health by improving opportunities for physical activity and access to healthy food, which enables numerous social equity benefits, and helps policy makers at all levels of government better integrate health considerations into planning processes and outcomes.”

“Planning for health requires government at all levels to address determinants of chronic disease early by integrating health considerations in planning.”

The action-oriented guide of the APA can be found at:

<https://www.planning.org/policy/guides/adopted/healthycommunities/>

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: 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. Within the PW Program, CDBG funds will be utilized for and made available under the LMI- National Objective measures. Funds are awarded for: community centers; senior centers exclusively for persons aged 62 and over; nonprofit centers for day care, primary health and mental health clinics; remodel shelter facilities for the homeless (excludes costs for operation); accredited public libraries; fire and/or rescue buildings, including fire trucks; removal of architectural barriers from city/village halls or county courthouses for accessibility; parks (a new facility/improvement or a quantifiable increase of an existing facility/improvement); street, curb, gutter, sidewalk, or storm sewer; flood control and drainage; and tornado-safe shelters in manufactured home parks.

For more information see the PW Application Guidelines.

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

Full applications are scored with pre-set categorical criterion as noted below. A scoring team will review the applications independently and then come together to prepare a consensus tabulation.

**Note: Grantees with open CD Category awards cannot apply within the PW Category.*

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 1,000 points. A minimum score of 300 points is required and some criteria require a minimum score as noted below. All selection criteria is scored on a scale.

Selection Criteria	Maximum	Threshold Minimum
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Project Need	200	75
Project Impact	200	75
Project Readiness	200	75
Citizen Participation	150	75
Matching Funds	50	-
LMI Benefit	50	-
Municipal Equalization Fund (MEF) Score	100	-
Achievements	50	-
Total:	1,000 points	300 points

Additional information regarding threshold requirements and eligible activities can be found within the Appendix, and within the PW Category Application Guidelines, found at:

<http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

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 PW Category 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 will be available in the Appendix and the DED website at:

<http://opportunity.nebraska.gov/community/grants/applications/cdbg-forms>

Describe how resources will be allocated among funding categories.

It is anticipated that \$3,000,000 in CDBG funds, \$1,000,000 of which is estimated 2018 allocation and \$2,000,000 of which is prior year resources, will be utilized for PW Category. Half of the allocation may be designated for infrastructure projects and the other half for facility projects.

If it is determined there are not enough eligible applications for funding during the first PW round, or in order to meet CDBG Timely Distribution, a second application round may be necessary during the Program Year.

Describe threshold factors and grant size limits.

All activities proposed in applications for CDBG funding in the PW Category must meet the national objectives of benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit, LMI Limited Clientele). A project or project activity that fails to meet the national objectives is ineligible.

The total CDBG maximum grant amount equals \$385,000, which includes the maximum of \$350,000 for project activities, a maximum \$25,000 for general administration activity, and a maximum of \$10,000 for construction management activity.

Maximum total CDBG grant amount = (A) + (B) + (C)	Maximum CDBG project activities (A)	Maximum CDBG *general administration activity (B)	Maximum CDBG **construction management activity (C)
\$385,000 Maximum total CDBG grant =	\$350,000 maximum	\$25,000 or 10% project activity, whichever less	\$10,000 maximum

*General Administration activities may not exceed 10% of the amount of CDBG funds awarded or \$25,000 , whichever is less.

**Up to \$10,000 will be available for Construction Management as it relates to Davis Bacon and Related Acts (DBRA) compliance.

The cost per beneficiary for infrastructure/facility (PW eligible activities) cannot exceed \$3,000. Except for child or adult care facility projects where the cost per beneficiary cannot exceed \$10,000. Recipients of PW resources are not required to use any of their award for General Administration and/or Construction Management.

For all PW non-administrative costs, a 25% match is required. PW non-administrative costs are those not associated with General Administration and/or Construction Management activities. General Administration and Construction Management activities require no matching funds.

Match may include public and private funds, or in-kind services, such as materials, labor, or other items that are CDBG-eligible and directly related to the project. 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 match funds. For example, match must be at least 12.5% in cash and no more than 12.5% in-kind contributions.

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: *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, defined as tourist attractions. For the purposes of this section “tourist attractions” include attractions developed by either for-profit or non-profit entities that are either public or private. These tourist attractions must be expected to draw 2,500 visits or more per year from origins of at least 100 miles away. Tourist attractions include sites and facilities that draw visitors from a significant distance away because of their scenic, historic, cultural, scientific, educational, and/or recreational attributes. These projects also serve and provide facilities that service other community and regional activities. Tourism projects generally focus on meeting and improving multi-faceted facilities for assisting in economic development at the local, regional, and statewide levels. Tourist attractions must meet a CDBG National Objective and also a state CDBG priority. A complete list of priorities, along with further information regarding the Tourism Development Program, will be in the Appendix

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

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

The Housing and Community Development Act 1974 objective funds use is for activities that primarily benefit low and moderate-income persons. Application activities are required to meet CDBG national objective as a threshold for review and funding consideration. TD Activities must meet the national objective benefiting persons of low and moderate income (LMI). Tourism Development activities meet the LMI national objective through job benefits as (LMJ) low-moderate income jobs and assisting elderly and severely disabled adults as (LMC) low-moderate income clientele. Tourism Development applicants are required to meet threshold requirements reviewed by DED according to the Selection Criteria Matrix. 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.

Full applications are scored with pre-set categorical criterion containing the following categories: Project Need, Project Impact, Project Readiness, Citizen Participation, Matching Funds, LMI benefit, and MEF. A scoring team will review the applications independently and then come together to prepare a consensus tabulation. . The Municipal Equalization Fund (MEF) evaluation criteria tool was created in 1996 as a needs-based method of providing state aid to cities. The Nebraska Department of Revenue administers the program, with data provided by the Department of Revenue's Property Assessment and Research Divisions, and the Nebraska Auditor of Public Accounts. Final aid calculations for Nebraska communities are posted in June of each year.

This aid formula provides a way of looking at needs and resources while at the same time ensuring that local governments provide a level of local resources. DED incorporates the MEF calculation as one of the scoring categories used to produce points towards the total score of a TD application.

Each city's population is multiplied by the average per capita property tax levy for the relevant population group. Then each city's property tax valuation is multiplied by the state average property tax levy. These numbers are used to make the preliminary determination for state aid under the MEF formula. If a city's population multiplied by the average per capita property tax levy is greater than the state-wide average levy multiplied by its valuation, the community qualifies for points towards their CDBG Public Works application. If the difference is negative, no points will be awarded under MEF category used for scoring CDBG Public Works applications. Populations, used in the MEF are based on the last decennial census including those modified by annexations that have taken place since the last census and any special censuses completed by the U.S. Census Bureau.

Overall, the information provided above is a summary of the criteria that will be utilized within the TD Program. Further information will be provided within the Appendix <https://opportunity.nebraska.gov/grow-your-community/reports-plans/> and within the CDBG Program Guidelines for this Program.

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

As noted above within the description of the criteria used to select applications, this information was a summary of the criteria. Complete information regarding the application criteria will be made available within the CDBG Tourism Development Application Guidelines. The Guidelines 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/community-development-block-grant/#guidelines>

Describe how resources will be allocated among funding categories.

Up to \$800,000, in resources will be made available within the 2018 Program Year for TD projects, \$459,000 of which is estimated 2018 allocation and \$341,000 of which is prior year resources.

The maximum Tourism Development grant amount is \$425,000, which includes maximums of \$400,000 for project costs, \$15,000 for general administration, and \$10,000 for construction management. The minimum amount an applicant shall apply for is \$50,000 in TD funds, which includes administrative and audit costs. In addition to the project activity maximum, 10% or \$15,000, whichever is less of the CDBG award is the maximum allowed for General Administration activities, and the maximum allowed for Construction Management activities is \$10,000.

Describe threshold factors and grant size limits.

Each project funded must meet the CDBG National Objective of benefiting persons of low and moderate income (LMI).

Proposed match must be from CDBG eligible activities directly related to the proposed project(s). 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.

Under the TD program category, project activities require a 25% match. No more than half of the total project match may be in-kind source contributions. The amount of match must be calculated in dollars.

	Match
TD activities	25%

The applicant would be allowed 10% or \$15,000, whichever is less of the CDBG award for General Administration and up to \$10,000 can be used for Construction Management.

General Administration and Construction Management do not require any matching funds.

Eligible local governments may individually or jointly apply and receive more than one grant per year in the Tourism Development Category.

Applications for CDBG TD awarded are accepted and considered on an open cycle. TD applications will be accepted beginning in May of 2018. Applications will be submitted as prescribed in the Tourism Development Application Guidelines.

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
- Activities are eligible and comply with a CDBG National Objective and State CDBG priority
- 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 (i.e. Davis-Bacon, acquisition, fair housing, etc.), if any, from past Awards and have had responses accepted by DED
- Applicant is current with all reporting requirements (semiannual status reports, closeout
 - reports, audit reports, notification of annual audit reports, etc.)

The maximum Tourism Development grant amount is \$425,000. The minimum amount an applicant shall apply for is \$50,000 in TD funds, which includes administrative and audit costs. In addition to the project activity maximum, 10% or \$15,000, whichever is less of the CDBG award is the maximum allowed for General Administration activities, and the maximum allowed for Construction Management activities is \$10,000.

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: 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. Within the WW Program, CDBG funds will be utilized for and made available under the LMI National Objective. WW Program 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.

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 apply with the Water Wastewater Advisory Committee (WWAC). WWAC is made up of several state and federal agencies that include: The Nebraska Department of Economic Development, the Nebraska Department of Environmental Quality, and 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 WWAC agency partners.

WWAC reviews the project pre-application then advises the applicant which assistance provider(s) can best meet the project funding needs. Project owners may also contact the individual agencies directly without going to the WWAC. 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 85 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 CDBG WW funding.

Once an invitation is extended, the eligible applicant has the option to submit a WW application which includes a one-page summary describing the nature and scope of the project. This summary is utilized to determine eligibility of project activities and provides overall context to the selection criteria of applications. This summary is of vital importance to the ability of DED to review an application based on the thresholds set forth in this section. Details can be further provided under the subsequent questions regarding the project need, impact, and national objective. The use of supplemental attachments provided by the applicant may also be submitted to further substantiate the application. Refer to the Appendix for additional details regarding the selection criteria.

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

As noted above within the description of the criteria used to select applications, this information was a summary of the criteria. Complete information regarding the application criteria will be made available within the CDBG Water Wastewater Application Guidelines. The Guidelines 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:

<http://www.opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/cdbg-forms>.

Describe how resources will be allocated among funding categories.

For this Program Year, DED anticipates utilizing \$2,662,680 of funding allocated to this program, of which \$1,000,000 is estimated out of the 2018 award, and \$1,662,680 from prior year resources. The WW award amount is based on beneficiary data of the project area as well as the feasibility and need for the project.

Describe threshold factors and grant size limits.

Each project funded must meet the CDBG National Objective of benefiting low to moderate (LMI) income persons. The maximum grant amount is \$385,000, which includes maximums of \$350,000 for project costs, \$25,000 for general administration, and \$10,000 for construction management. No more than 10% of the amount of the grant or \$25,000, whichever is less, may be used for general administration.

No more than \$3,000 in CDBG funds per beneficiary of record can be invested in the described project area.

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

DED will be able to identify those water/wastewater project areas that meet a CDBG National Objective and target those projects that are impacting the safety of our citizens. Through a collaborative effort with other funding agencies, DED is better able to leverage CDBG resources in order to obtain maximum impact.

Discussion:

Community Development Block Grant (CDBG)

Distribution of Other CDBG Funds Remaining Funds

Funds remaining uncommitted and unobligated from prior years' allocations on the acceptance date for the 2018 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 funding category identified in the 2018 Annual Action Plan. Funds for State Administration and Operations 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 2018 shall be used in conformance with the 2018 CDBG Program Guidelines, unless otherwise specified by HUD.

Redistributed 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 prioritization noted below.

The first priority for the redistribution of recaptured CDBG funds is to the Public works (PW) Program. 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) Program 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.

The third priority for the redistribution of recaptured CDBG funds is to the Water/ Waste Water Program of the Community Development Priority Need. Otherwise, funds recaptured from prior CDBG projects will be redistributed in conformance with the 2018 Program that is most similar to the Program from which the original award was made.

Funds recaptured from Economic Development Program grantees may be redistributed to either the Economic Development Program or the Tourism Development Program in conformance with 2018 Program Guidelines, or may be distributed among other funding programs.

Funds recaptured from Public Works; Water/Wastewater; Housing; Comprehensive Development; Planning; and Downtown Revitalization Program grantees will be redistributed in conformance with 2018 Program Guidelines as follows: (1) if there are sufficient funds within 105 days from the date of the 2018 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 2018 CDBG application acceptance date, may be redistributed in conformance with the Program Guidelines of any 2018 CDBG Program.

In addition, CDBG funds recaptured from Housing Program grantees (the CDBG OOR Program) may be redistributed for housing activities in the CD Program. In addition, funds recaptured (de- obligated) from HOME and NAHTF grantees may also be redistributed for housing activities within the CD communities.

CDBG Program Income (Economic Development and Housing)

Program income is defined as gross income received by a State, a unit of general local government, or a sub-grantee of the unit of general local government that was generated from the use of CDBG funds, regardless of when the CDBG funds were appropriated and whether or not 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 may use up to 3% of the amount recaptured and reportable to HUD each year for administrative expenses under the Nebraska Community Development Block Grant (CDBG) Program, including amounts recaptured and reported to HUD from and during all open grant years.

There are 2 primary types of CDBG program income that is generated through program-eligible activities and these include Economic Development (ED) program income and Housing program income. ED program income is incurred through ED Program activities as defined within the Economic Development Program and Housing program income is created through the CDBG OOR Program activities.

Further information regarding CDBG program income is identified within the Appendix (<https://.opportunity.nebraska.gov/aap>).

AP-35 Projects – (Optional)

Introduction:

There are currently no 2018 projects to report at this time as the 2018 Program Year does not begin until July 1, 2018. Funding for CDBG, HOME, HTF, ESG, and HOPWA projects will not be determined until program-specific applications are received and evaluated, which will occur in 2018.

It is for this reason that the table below is blank as generated by the IDIS system.

#	Project Name

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

As projects are funded through CDBG, HOME, HTF, ESG, and HOPWA additional information will be provided within the AP-35 Section.

AP-38 Project Summary (optional)

Project Summary Information

There are currently no 2018 projects to report at this time as the 2018 Program Year does not begin until July 1, 2018. Funding for CDBG, HOME, HTF, ESG, and HOPWA projects will not be determined until program-specific applications are received and evaluated, which will occur in 2018.

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 will review the local revitalization strategies of the Comprehensive Development Program communities. This strategy review includes evaluating the planning process completed during the pre-development phase of the project, and evaluating the proposed activities within the Comprehensive Development Program. This is to ensure that during Program Year 2018 these activities meet a CDBG national objective of benefitting low-and-moderate income persons (through the subcategories LMI Area Benefit; LMI Limited Clientele; or LMI Housing). Any project or project activity that fails to meet one of these specified national objectives is ineligible.

In 2018 the State of Nebraska will continue to combine the CDBG Comprehensive Revitalization (CR) Program and Comprehensive Investment & Stabilization (CIS) Program into one competitive program called Comprehensive Development (CD). Activities funded within the CD Program Category include

those identified as State CDBG Priorities in the Housing, Public Works, Planning, and Downtown Revitalization program categories.

During the 2016 Program Year, communities were selected for Phase I (pre-development) funding.

Following the successful completion of the pre-development study, the second phase allows for implementation of activities identified in the pre-development study. Applicants have the opportunity to receive implementation (Phase II) funding over a two-year period. The first allocation (“Year 1”) of implementation resources were awarded during the 2017 Program Year. Those communities that receive resources for Phase II activities will have the opportunity to utilize additional resources for a second allocation (“Year 2”) of implementation funding. The purpose of the second allocation of funding is to continue (or expand) the activities completed during the first allocation of Phase II resources.

There are two “options” for applying for an award under Year 2: (A) where activities are continuation of those approved and included in the Year 1 contract and (B) where activities are expanded beyond those approved in Year 1 with the additional caveat that housing activities are not allowed under Year 2 unless they were incorporated in Year 1. For Option A, the Year 1 application may be updated for the activities and accomplishments undertaken and underway as it relates to those continued activities proposed for Year 2. For Option B, the Year 2 application must also include additional information regarding the newly proposed activities and their relationship to those activities and accomplishments undertaken and underway as a part of Year 1.

Eligible communities include only those communities that previously received Phase I and Phase II Year 1 resources.

The CDBG entitlement communities of Omaha, Lincoln, Bellevue, and Grand Island are not eligible nor are any other communities who were not selected for CD Phase I and Phase II Year 1 funding. Phase II Year 2 is not a guaranteed allocation. See the “Threshold Requirements” within the Appendix: (<http://opportunity.nebraska.gov/community/community-info/documentslibrary-a-forms/annual-action-plan>) for specific thresholds that are also considered in determining eligibility.

Grantees with open CD Category awards cannot apply within the Public Works and Water Wastewater categories.

The maximum grant amount for CD activities was \$30,000 for Phase I (pre-development), and was funded during the previous Program Year. Up to \$780,000 is available for Phase II (implementation) with \$350,000 being provided during the first allocation of implementation funding and \$430,000 being provided for the second allocation of funding.

During the 2018 Program Year, CD projects must benefit low- to moderate-income residents of the community, primarily those residing within a CD target area. The cost per resident beneficiary for infrastructure (PW eligible activities) cannot exceed \$3,000. Recipients of CD resources are not required to use any of their award for General Administration, nor for either Construction Management or Housing Management. CD is a competitive program category.

The 2018 Program Year will be the last year of the Comprehensive Development Program Category under the CDBG Program. The CD Program did not fulfill the CDBG priorities as the State had anticipated and therefore the program is closing. The Community Development Priority Goals may not be met during the 2018 Program Year as a result.

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.

It is for this reason that the table below is blank as generated by the IDIS system.

Geographic Distribution

Target Area	Percentage of Funds
Statewide	100

Table - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Not applicable.

Discussion

The State of Nebraska will distribute development resources in proportion to the development needs of the state. In general, the Nebraska Department of Economic Development and the Nebraska Department of Health and Human Services will approve funding for development projects which 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.

In regard to the HTF Program, geographic distribution will be dependent on which HTF application cycle funds are being requested, as the discussion below demonstrates.

CRANE Set Aside

For HTF applicants applying within the CRANE Set Aside, the entire state is the eligible area. The joint DED/NIFA application cycle for CRANE 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 projects. These numbers do not include households assisted through NAHTF as this is a State resource and the State is not required to report these numbers within the context of the Annual Action Plan.

One Year Goals for the Number of Households to be Supported	
Homeless	452
Non-Homeless	125
Special-Needs	57
Total	634

Table - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	464
The Production of New Units	70
Rehab of Existing Units	80
Acquisition of Existing Units	25
Total	639

Table - 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.

One year goals for the number of “Homeless” households supported are estimated from the number of households that will receive TBRA through the Nebraska Homeless Assistance Program (See also AP-20).

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).

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 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).

The production of new units will be completed primarily through HOME resources that will be utilized through the NIFA/DED Low Income Housing Tax Credit (LIHTC) Application Cycle that utilizes LIHTCs and HOME funds in order to provide additional affordable housing. In addition, NAHTF resources may also be

used for this activity.

The production of additional new units may also be completed with HTF resources that will be utilized through the NIFA/DED CRANE Application Cycle that utilizes LIHTCs and HTF funds in order to provide additional affordable housing for extremely low-income persons.

Rehabilitation of existing units is completed primarily through CDBG resources within the Owner Occupied Rehabilitation Program administered by the Nebraska Affordable Housing Program. Additional rehabilitation activities may occur through the NIFA/DED Low Income Housing Tax Credit (LIHTC) Application Cycle that utilizes LIHTCs and HOME funds in order to provide additional affordable housing. In addition, NAHTF resources may also be used for this activity.

Rehabilitation of rental units in order to create additional units for ELI populations is used in each of the 3 Continuums of Care through the use of a portion of HTF funds. This additional safe and affordable housing will help to improve the lives of underserved populations in the state.

The number of households supported through acquisition of existing units is performed through HOME funding to eligible CHDO organizations in order to meet the HOME regulatory requirement which ensures that at least 15 percent of the HOME allocation is utilized for CHDO activities. It is anticipated with the estimated \$450,000 in HOME funds proposed for 2018, approximately 25 households will be assisted with acquisition, new construction, and rental rehabilitation based on HOME funds and additional resources utilized by eligible CHDOs.

It is anticipated that additional households will be supported through NAHTF projects, which will likely include those that involve acquisition of existing units. Specific numbers and estimates regarding NAHTF accomplishments were not available during the development of this Consolidated Plan, as this information is compiled and calculated through a separate NAHTF cycle. This information will be compiled separately through the implementation of additional housing programs.

In addition, based on the findings within the “Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska” there is a significant need for the development of additional Permanent Supportive Housing (PSH) throughout the state. Collaboration and partnerships should be

developed and evaluated in order to address these continued needs in order to serve persons who are homeless or at risk of homelessness. Through the implementation of the National Housing Trust Fund, additional permanent housing will be created which will serve those persons.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

As the State Department of Economic Development, DED does not manage or oversee funds to any of the Public Housing Authorities throughout the state. The State will continue to work with the Public Housing Authorities (PHAs) to house Nebraska's low-income households to the extent that is necessary. PHAs are eligible applicants for some DED resources including Nebraska Affordable Housing Trust Fund (NAHTF) resources.

Actions planned during the next year to address the needs to public housing

This Annual Action Plan is for a State grantee, and therefore no summary information is available on the actions planned for multiple Public Housing Authorities in Nebraska. This information would be obtained by contacting a given PHA within a designated geographic area.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

This Annual Action Plan is for a State grantee, and therefore no summary information is available on the actions planned for multiple Public Housing Authorities in Nebraska. This information would be obtained by contacting a given PHA within a designated geographic area.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Discussion:

DED will work in partnership with HUD and the troubled PHA, as designated by HUD, to understand and assess the situation of the troubled PHA. If warranted, appropriate, and available, DED will offer assistance to the PHA to identify potential federal and state technical and/or financial resources for which the PHA is an eligible applicant with eligible activities.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

See below.

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

NHAP:

The State of Nebraska's NHAP funding is focused on assisting the literally homeless and at risk of homeless in support of reaching the goal of functional zero of homeless individuals in Nebraska. The Coordinated Entry process utilized the VI-SPDAT that 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 and make referrals to the Coordinated Entry system.

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 lesser needs may qualify for Rapid Rehousing Programs. Homeless Youth have most recently been included in the Coordinated Entry system for the Transition Aged Youth (TAY) program. 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. A major achievement 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 as applicable. NHAP is working 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.

Many of the NHAP funded programs are refocusing an allotment of their resources towards developing Rapid Rehousing programs in an effort to move individuals quickly from literally homeless to housed with sufficient supports in place to promote the participant's success. For the upcoming NHAP program year, the NHAP application has identified that Rapid Rehousing programs will be ranked as a priority for the expanded funding made available.

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 RR and HP 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/or participant need for intensive case management and services prior to independent housing.

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 collaborate within their region to provide seamless services from emergency shelter to permanent housing solutions through the utilization of the Coordinated Entry system.

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

1. Increased use of bed utilization rate.
2. The average length of stay of the households served decreased from prior year.
3. Increase in the percentage of discharged households to permanent housing.

For NHAP program funded to support Transitional Housing Programs, performance will be measured based on:

1. Increased use of bed utilization rate.
2. Increase in the percentage of discharged households to permanent housing.
3. Increase in the percentage of discharged households with more cash and non-cash benefits.

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 the VI-SPDAT, FAM-SPDAT and TAY-SPDAT tool 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 PSH Coordinated Entry list and those individuals with lesser needs are placed into permanent housing through Rapid Rehousing programs. A separate Coordinated Entry list identifies homeless youth for placement in appropriate housing programs. 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. 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. The Nebraska BoS has been certified 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 BoS CoC and will continue to meet the needs of homeless veterans.

Over the course of the next year, NHAP will continue 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 the Department of Economic Development and other Federal and State agencies to identify where there is a lack of affordable housing and gaps in services across the State. NHAP will evaluate subrecipients' performance and future funding will be prioritized for subrecipients who are actively engaged to help keep recently housed individuals from returning to homelessness. The goal to increase the percentage of discharged households with both more cash (either through public assistance, SSI or employment income) and non-cash benefits should help increase the economic security many individuals and families need to successfully maintain self-sufficient housing. 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.

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 ESG/HSATF which targeted towards homeless prevention. For the 2018-19 grant year, a heavily weighted scoring

component will be added to promote collaboration between homeless assistance and mainstream service providers to maximize the funding availability to avoid individuals and families from becoming homeless. NHAP will also continue to prioritize Homelessness Prevention services for funding to prevent entering into a homeless situation due to emergency situations. In addition, a Diversion training has been offered to all homeless assistance providers to promote a model to divert low-income and at-risk of homeless individuals and families from entering homelessness across the state.

Community Action Programs and other non-profits provide wrap-around services to address poverty and NHAP is committed to supporting these efforts. 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 and/or grants distributed state-wide to provide financial assistance to those who are extremely low-income and require assistance in order to stabilize their financial situation to ensure they are able to maintain self-sufficient housing. NHAP's goal to increase the percentage of households with both more cash and/or non-cash benefits for all programs participants receiving Homelessness Prevention assistance to help those low-income families and individuals decrease entering homelessness. These efforts to connect homeless and at risk of homeless to mainstream economic assistance services are evaluated through the NHAP application process.

In additional support of these efforts, NHAP currently sets aside a portion of the Homeless Shelter Assistance Trust Fund 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 benefits through the SOAR program to improve economic self-sufficiency. The goal of NHAP is to employ this model with qualifying youth transitioning out of foster care and correctional facilities to establish these benefits to support these populations.

The State 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 and work towards integrating individuals served with

mainstream resources and services. NHAP will continue to work and support the CoCs involvement to provide permanent supported housing options for those individuals that are currently homeless through the utilization of the standardized assessment tool and Coordinated Entry process.

Discussion

See above for additional information.

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 2018 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

Discussion:

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 2015-2019 Consolidated Plan. The State has adopted a strategy to remove or ameliorate barriers to affordable housing as identified within SP-55 of the 2015-2019 Consolidated Plan. During the 2018 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 new 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 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 State Department of Economic Development will continue to collaborate with the Nebraska Department of 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.

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.

The National Housing Trust Fund (HTF) is a new 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.

The first set-aside program is the CRANE Set-Aside Program. The State will remove barriers to affordable housing for ELI populations by coordinating joint applications for low income housing tax credit applications with the Nebraska Investment Finance Authority (NIFA). The second set-aside program is the Targeted Needs Set-Aside. It will be used for projects that focus on targeted / special needs housing projects that do not use any low-income housing tax credit resources. This will assist in the amelioration of the barrier of the shortage of housing for ELI populations with targeted needs. The third set-aside is

the Permanent Housing Set-Aside Program, which will remove barriers to affordable housing by funding permanent housing projects for the ELI population that is homeless, at risk of homelessness, and other special needs ELI populations. All three set-asides are able to provide funds to projects that acquire, rehabilitate, and resell existing residential units, rehabilitate residential units for the creation of new permanent housing units, rehabilitate existing housing units, or construct new rental units for ELI citizens in general, including those who are homeless, have special or targeted needs, or are at risk of becoming homeless. All projects eligible under the set-asides will assist in ameliorating the barrier of a lack of rental housing for the ELI population, and if available funds under any one of the set-aside programs are not fully utilized then those funds may be used for any projects under the other two set-aside programs.

AP-85 Other Actions – 91.320(j)

Introduction:

The following are actions planned throughout the course of the Consolidated Plan period (2015-2019).

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 Programs and 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, and other housing activities. These actions will be funded through HOME, for rental housing development and activities related to CHDOs; through CDBG, for OOR, and through the NAHTF, for rental development, homeownership activities, OOR, and non-profit operating assistance. In addition, HTF resources will be used for creating and maintaining rental units throughout the state to serve ELI persons.

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.

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 the that grantees and sub-grantees 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. The 2015-2019 Consolidated Plan focuses on improving institutional structure through coordination. 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 WWAC).

Actions planned to enhance coordination between public and private housing and social service agencies

DED will continue to coordinate with public partners in the Affordable Housing Agency Committee (AHAC) process, which includes regularly scheduled meetings with the Nebraska Investment Finance Authority (NIFA), the USDA, the City of Omaha, the State Historic Preservation Office (SHPO), and any other interested parties in order to discuss current projects and methods to coordinate efforts throughout the state.

In addition, 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.

The Nebraska Homeless Assistance Program (NHAP) is housed within the infrastructure of the Department of Health and Human Services. Being part of this collective organization, which includes Behavioral Health, Developmental Disabilities, Medicaid, and Public Health, allows for continued collaboration and coordination across the various disciplines in support of the delivery of housing and supportive service needs. At the local level, the BOS works proactively with regional CoC partners. CoC partners engage various public and private nonprofit organizations, such as local Housing Authorities, Veterans Administration, Employment First, and SNAP to ensure that efficient and effective coordination of services exists between affordable housing and social services.

Through the implementation of the National Housing Trust Fund, additional collaboration will be completed with DED, DHHS, Public Housing Authorities, and homeless service providers in order to work at providing

housing for extremely low-income persons throughout the state.

Discussion:

Through the above identified actions the State will continue to address these various issues and is committed to addressing these issues throughout the implementation of the 2015-2019 Consolidated Plan.

Program Specific Requirements

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 that is available for use that is included in projects to be carried out.

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	1,320,926
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:	1,320,926

Other CDBG Requirements

1. The amount of urgent need activities	0
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.	70.00% of CDBG funds will be used to benefit LMI persons during 2016, 2017, and 2018

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:**

The Appendix to the Annual Action Plan contains the full language of the resale and recapture provisions for the HOME program. This information is also available on the DED website at:

www.opportunity.nebraska.gov/aap

- 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:**

The Appendix to the AAP contains the full language of the resale and recapture provisions for the HOME program. This information is also available on the DED website at:

www.opportunity.nebraska.gov/aap

- 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):

Note: ESG standards are a Living document and as such, will be revisited, edited and updated as needed. Currently the written standards are being revised to incorporate additional standards regarding the Coordinated Entry process. Any revisions made to this document will be posted on the NHAP website at:

http://dhhs.ne.gov/children_family_services/Documents/CoC-ESG%20Written%20Standards%20Nebraska%20BoS%20CoC%20FINAL%20rev%20%201.pdf

See the attached ESG Standards found within the Appendix and can be reviewed on the NHAP website at:

http://dhhs.ne.gov/children_family_services/Pages/fia_nhaphistoryofnhap.aspx

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 and Lincoln 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 was designated by the CoCs 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):

In an attempt to reduce NHAP grant management and administrative burden, 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.

Grant year 2018-2019 is the 1st year of this two-year grant cycle, which is an open competition year. Renewing and new NHAP applicants will submit a full application which includes performance outcomes from the previous year and narratives relating to the need of the program in their community, collaboration with other homeless providers, and outcomes for the individuals they serve. Agencies that have not been funded through NHAP in the previous funding cycle will not be able to report out the full data requested in the NHAP application; however, the HMIS lead (CCFL) has been developing other types of performance reports to allow overview of performance measurement factors. One new report that is being reported for FY18 is data on the percentage of individuals who have exited homeless programs to permanent housing and a breakdown on returns to homelessness at 6, 12, and 24 month time periods.

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. Funding by geographic region is announced prior to the application process and awards are based on input from the applicable CoC 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. 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 goal of the BoS for the upcoming program year is the establishment of 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 will also appoint a representative to participate in the BoS CoC meetings to provide input.

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, reducing returns to homelessness and maintaining/increasing income.

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 bi-annually to all CoC and ESG grantees. NHAP has also incorporated these performance measurements into the annual application process as an evaluation component of how successful NHAP sub-recipients are at 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. See also

Performance Measures Section at (<https://.opportunity.nebraska.org/aap>). See prior sections for additional information.

Discussion: See above

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

Nebraska will not distribute HTF funds through subgrantees.

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; public housing authorities; and State designated Community Housing Development Organizations 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:

- 5) 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;
- 6) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
- 7) 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
- 8) 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

4. Nebraska will reserve a portion of the State's annual HTF allocation to affordable rental, multi-family projects in coordination with Nebraska Investment Finance Authority (NIFA) through the joint DED/NIFA application for low income housing tax credit applications within the Collaborative Resource Allocation for Nebraska (CRANE) application cycle. This allocation will be referred to as the "CRANE Set Aside".

For 2018, the amount available to multi-family projects in CRANE will be **\$639,486**.

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

5. Nebraska will allocate a portion of the State's annual HTF allocation for targeted needs housing projects funded with non-LIHTC resources. These pilot 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".

For 2018, the amount available for a HTF Special Needs project will be **\$2,100,000**.

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

6. 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."

For 2018, the amount available for permanent housing will be \$4,500,000 and include:

\$1,500,000 within the Omaha Continuum of Care;

\$1,500,000 within the Lincoln Continuum of Care; and

\$1,500,000 within the Balance of State (BoS) Continuum of Care.

Funds not utilized within this category may be utilized within the other Set Asides in order for the State to timely distribute HTF funds.

The above mentioned amounts reflect the estimated allocation of \$2,700,000 in HTF resources, and \$4,539,486 in prior year resources, allowing for \$7,239,486 HTF funds available for project activities. The remaining \$600,000 in funds, \$300,000 of which are prior year state administration funds, will be used by the State for planning and administration.

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 percent of the HTF funds will benefit extremely low income (ELI) households for rental housing and 10 percent will be used for administrative 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 Nebraska 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 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 NDED-provided forms for current year application will be posted on the NDED 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 NDED 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.

NDED 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.

NDED reserves the right to deny HTF funding to any applicant or project regardless of scoring determination if the NDED 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 DED 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.

CRANE Set Aside

For HTF applicants applying within the CRANE Set Aside, the entire state is the eligible area. The joint DED/NIFA application cycle for CRANE 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. See also the CoC map below.

- 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".**
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. Please see the 2018 Proposed HTF Allocation Plan in the Appendix

- 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 2015-2019 Consolidated Plan are addressed. That is, what objectives and under which priority need is the application addressing and fulfilling?

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:

1. Is the project application promoting additional affordable rental housing and preservation of affordable rental housing in selected markets?
2. Is the project application promoting housing preservation by improving the quality of Nebraska's existing affordable housing?
3. Does the project application enhance statewide understanding of fair housing law through outreach and education?

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.

1. Does the project application provide appropriate shelter and/or housing to people who are homeless or at imminent risk of becoming homeless?
2. Does the project application provide needed services to people who are homeless or at imminent risk of becoming homeless?

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.

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, the State requires that the grantee's application include a description of the eligible activities to be conducted with HTF funds. For example, it a requirement is to 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.

Also to Describe how the proposed project impacts the community. Please see the 2018 Proposed HTF Allocation Plan in the Appendix

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, the State includes in the application that the eligible recipient certifies that they will comply with HTF requirements.

Please see the 2018 Proposed HTF Allocation Plan in the Appendix

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.

The plan must include performance goals and benchmarks against which the State will measure its progress, consistent with the State's goals established at § 91.315(b)(2). To comply with this requirement, the State will include HTF housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens in the eCon Planning Suite consolidated plan template in IDIS.

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit develop

8. Rent 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

X State adopted limits used in other federal programs and the limits are attached. (Please see HTF Allocation Plan)

Supplemental Information for Maximum Per Unit Subsidy

During the second year of the program, while Nebraska and its development partners gain experience using HTF to create affordable rental housing to ELI households, 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 times 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		\$ 58,787.00	\$ 67,391.00	\$ 81,947.00	\$ 106,013.00	\$ 116,369.00
Des Moines MSA Guthrie, Dallas, Polk, Madison and Warren Counties	233%	\$ 136,973.71	\$ 157,021.03	\$ 190,936.51	\$ 247,010.29	\$ 271,139.77

Omaha MSA Saunders, Washington, Douglas, Sarpy and Cass Counties in Nebraska Harrison, Pottawattamie and Mills Counties in Iowa	233%	\$ 136,973.71	\$ 157,021.03	\$ 190,936.51	\$ 247,010.29	\$ 271,139.77
All other PJs/Counties	215%	\$ 126,392.05	\$ 144,890.65	\$ 176,186.05	\$ 227,927.95	\$ 250,193.35

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.

	Graham Park	Meadow Vista	Heather Estates	Wilderness Falls
Location	Seward	North Platte	Imperial	Falls City
Total Cost	\$2,167,429	\$2,192,111	\$1,870,420	\$3,016,216
Number of Units	11	12	10	16
Total Cost Per Unit	\$197,039	\$182,676	\$187,042	\$188,514
Unit Description	6 3-Bedroom units; 3 4-Bedroom units; 2 3-Bedroom market rate units	12 3-Bedroom units	6 3-Bedroom units; 2 4-Bedroom units; 2 3-Bedroom market rate units	14 2-Bedroom units; 2 3-Bedroom units

Subsidy limits evidence continued:

	Lofts on 24 th Street	Northwest Senior	City Impact	Ambassador& President
Location	Omaha	Omaha	Lincoln	Lincoln
Total Cost	\$4,452,482	\$6,262,366	\$4,354,891	\$7,996,507
Number of Units	20	36	14	71
Total Cost Per Unit	\$222,624	\$173,955	\$311,063	\$112,626
Unit Description	3 2-Bedroom units; 14 3-Bedroom units; 3 4-Bedroom units	36 3-Bedroom units	14 4&5-Bedroom Units	30 SRO Units; 41 1-Bedroom Units

9.

Please see the 2018 Proposed HTF Allocation Plan in the Appendix

10. 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 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.

Supplemental Information for Rehabilitation Standards

Additional information regarding DED Rehabilitation Standards is identified within the Attachments in the HTF Allocation Plan.

11. 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".

Please see the 2018 Proposed HTF Allocation Plan in the Appendix

12. 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".

The State will not use HTF fund for homeownership housing.
Please see the 2018 Proposed HTF Allocation Plan

13. 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 CRANE cycle, a portion of HTF resources will be utilized. Preference in this category will be given 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 distressed 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. From the most recent data it was found that based on ESG household placements only 37% of the household placements were into permanent housing. See also AP-65 of the 2018 AAP and SP-60 of Consolidated Plan.

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. See also AP-85 of the 2018 AAP and SP-70 of the Consolidated Plan.

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.

14. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below.

The State of Nebraska will not permit the refinancing of existing debt.

Discussion:

See above and the 2018 Proposed HTF Allocation Plan for additional information.