

STATE OF NEBRASKA

2015-2019

CONSOLIDATED PLAN

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, 2015 - June 30, 2020

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ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The Consolidated Plan is the five-year housing and community development planning process required by the United States Department of Housing and Urban Development (HUD), in exchange for receiving formula grant funds. This three-part planning process has been developed for the 2015 through the 2019 Program Years. Federal resources provided by HUD that are discussed within the Plan include: Community Development Block Grant (CDBG); the HOME Investment Partnerships Program (HOME); Emergency Solutions Grant (ESG) Program; and Housing Opportunities for Persons with AIDS Program (HOPWA).

In addition, where appropriate, information on two State Programs will also be discussed within the Consolidated Plan that includes the Nebraska Affordable Housing Trust Fund (NAHTF) and the Homeless Shelter Assistance Trust Fund (HSATF). The CDBG, HOME, 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 and HSATF resources are utilized by DHHS and 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 (HSAFT) 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 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. The formula is determined using a minimum funding amount for all regions, population base, poverty data, and pro-rata percent. The formal and funding process emphasizes equitable distribution as well as quality projects and programs.

The Nebraska Consolidated 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 2015, with estimated projections for the five years in parentheses:

CDBG: \$9,464,002 (\$47 million)

HOME: \$3,002,167 (\$15 million)

ESG: \$948,440 (4.7 million)

HOPWA: \$362,364 (\$1.8 million)

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 2015 as well as the estimated projections for the five year period within parentheses:

NAHTF: \$9 million (\$45 million)

HSATF: \$1.9 million (\$9.5 million)

Covering all areas of the State, except metropolitan Omaha, Lincoln and Bellevue, the Consolidated Plan establishes funding priorities for these programs, outlines objectives, and identifies a one-year action plan for program implementation. As CDBG Entitlement Areas, Omaha, Lincoln, and Bellevue receive funds for these programs directly, and are required to prepare and submit their one Consolidated Plans.

Overall, Nebraska's 2015-2019 Consolidated Plan serves the following functions:

- A planning document for the State which builds on a comprehensive consultation and citizen participation process;
- An application for federal funds under HUD's formula grant programs;
- A strategy for housing, homelessness, and community and economic development; and
- An action plan that provides a basis for measuring and assessing performance.

The consolidated planning process is an opportunity for strategic planning and citizen participation to take place comprehensively. This process brings local governments; community organizations; state and federal agencies; service providers; and citizens together in order to address program operations and to provide efficient service delivery.

Priorities and Objectives were developed utilizing public input and consultation from advisory groups; local community leaders; concerned citizens; nonprofit organizations; advocacy groups; the private sector; and representatives of state and federal agencies.

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

The State of Nebraska identified five Priority Needs for the five year period covered by the 2015-2019 Consolidated Plan. These Priority Needs included:

- 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, ESG, or HOPWA Programs are:

- Improved availability/accessibility
- Improved affordability
- Improved sustainability

The future activities funded within the next five years will support at least one objective and one outcome as described above. The statutes for CDBG, HOME, 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, 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, affordability, and sustainability.

3. Evaluation of past performance

The State of Nebraska is in the process of completing its final Program Year under the 2010-2014 Consolidated Plan. DED and DHHS have been successful in furthering the priorities, strategies, and objectives put forth within that Consolidated Plan for the CDBG, HOME, ESG, and HOPWA Programs. Specific information on the State's performance can be found within the Annual Performance Reports for 2010, 2011, 2012, and 2013, which are available on DED's website at: <http://neded.org/community/grants/documentslibrary-a-forms/annual-performance-report>.

The 2014 Annual Performance Report will be available after the conclusion of the 2014 Program Year and will be finalized for HUD in September 2015.

4. Summary of citizen participation process and consultation process

Within the summer and fall of 2014, DED and DHHS distributed a Community Needs Survey throughout the state. This survey was utilized to gather information from respondents on their views on the specific needs and priorities within their communities.

After the completion of the Community Needs Survey process, survey data was evaluated and this information was utilized as a starting point for discussion with various individuals, groups, and organizations during formal and informal focus group sessions held throughout the state. This wide variety of contacts included: local officials, Development Districts, members of substance abuse and mental health committee members, housing advocates, homeless services advocates, and other members of the public.

The State of Nebraska conducted two public hearings on housing and community development issues in order to allow citizens the opportunity to provide input for the 2015-2019 Consolidated Plan. The Consolidated Plan is the policy guide for federally-funded community development and housing programs. The public hearings included presentations which focused on housing and community development strategies to address housing and community development needs throughout the state. The public hearings were held in Lincoln, but with satellite sites throughout the state that included: Chadron, Columbus, Grand Island, Hastings, Norfolk, North Platte, and Wayne.

Prior to the public hearings, public notices were published in newspapers throughout the state. Public hearing notices via email were also posted on the DED website; distributed to local officials; developers; non-profit organizations; Development Districts; the NCHH; and the CoCs throughout the state. Detailed information on the citizen participation process and public outreach can be found within Sections PR-10 and PR-15 of this Consolidated Plan.

5. Summary of public comments

Comment #1

After a review of the 2015-2019 Consolidated Plan and Proposed 2015 Annual Action Plan, the City of Seward respectfully submits the following comments and recommendations for NDED's consideration of the Final Plan, specifically under the section discussing **CDBG Program Income—Economic Development Program Income** (Pages 17-25):

Economic Development Program Income/Using the program income within an existing Local ED Revolving Loan Fund

Item #3 – Revised Local Reuse Plan

- We support the local government developing and adopting a Revised Local Reuse Plan that must be approved by DED.
- We are aware that the Local Reuse Plan must include a description of the priorities of the program income projects that may be approved by the unit of local government which will be consistent with the definitions of “continuing the same project activity.”
- We have a concern that there may be less flexibility regarding the priorities of program income projects than what is currently allowed in existing CDBG Economic Development Reuse Plans, in particular eligible businesses which include retail businesses.
- We would request consideration in allowing counties and communities with existing Local ED Revolving Loan Funds some flexibility and input in determining eligible businesses under the plan, specifically regarding retail.
 - Recommendation: Include language indicating that the local government will be given flexibility and input in determining priorities of program income projects under the Revised Local Reuse Plan. Priorities of program income projects would be based in part on what is currently allowed in existing CDBG Economic Development Reuse Plans, allowing retail businesses to remain eligible under these Revised Local Reuse Plans.

Thank you for comments regarding Economic Development Program Income. Grantees with an existing ED Local Reuse Plan will continue to have flexibility in determining eligible businesses under their plan. This would include allowing retail businesses to be eligible in an existing ED Local Reuse Plan.

In order to accomplish these objectives, and follow the intent of the use of Local CDBG Program Income, the Department is revising its guidance on CDBG Program Income as identified within the 2015 Annual Action Plan in order to better clarify the terms “continuing the same project activity”.

The revised language within the Appendix to the 2015-2019 Consolidated Plan and 2015 Annual Action Plan is noted below. This language will be incorporated into the final Consolidated Plan and Annual Action Plan information that is submitted to HUD. The language includes:

For the purposes of program income, “continuing the same project activity” will be defined as:

- *For local governments with existing program income in an existing Local ED Revolving Loan Fund, or who are currently utilizing the NDO process, continuing the same project activity will include providing assistance for the same CDBG eligible activities as defined in the grantee’s new DED-approved Local Program Income Reuse Plan (also known as a Local Reuse Plan).*
- *For newly awarded economic development grantees (including those units of general local government awarded new CDBG funds during the current Program Year for new CDBG eligible activities), program income that was generated from the use of CDBG funds for the above mentioned newly awarded activities may be deposited into an existing Local ED Revolving Loan Fund or a new Local ED Revolving Loan Fund. Any program income that is deposited in this manner, continuing the same project activity will include providing assistance to the same business for the same activity for which it was originally funded.*
- *For newly awarded economic development grantees (including those units of general local government awarded new CDBG funds during the current Program Year for new CDBG eligible activities), program income that was generated from the use of CDBG funds for the above mentioned newly awarded activities may utilize the NDO process. In the instance where the NDO process is utilized, continuing the same project activity will include providing assistance for the same CDBG eligible activities as defined in the grantee’s DED-approved Local Program Income Reuse Plan (also known as a Local Reuse Plan).*

Comment #2

After a review of the 2015-2019 Consolidated Plan and Proposed 2015 Annual Action Plan, the City of Pawnee City respectfully submits the following comments and recommendations for NDED’s consideration of the Final Plan, specifically under the section discussing **CDBG Program Income—Economic Development Program Income** (Pages 17-25):

Economic Development Program Income/Using the program income within an existing Local ED Revolving Loan Fund

Item #3 – Revised Local Reuse Plan

- We support the local government developing and adopting a Revised Local Reuse Plan that must be approved by DED.
- We are aware that the Local Reuse Plan must include *a description of the priorities of the program income projects that may be approved by the unit of local government which will be consistent with the definitions of “continuing the same project activity.”*
- We have a concern that there may be less flexibility regarding the priorities of program income projects than what is currently allowed in existing CDBG Economic Development Reuse Plans, in particular eligible businesses which include retail businesses.
- We would request consideration in allowing counties and communities with existing Local ED Revolving Loan Funds some flexibility and input in determining eligible businesses under the plan, specifically regarding retail.
 - Recommendation: Include language indicating that the local government will be given flexibility and input in determining priorities of program income projects under the Revised Local Reuse Plan. Priorities of program income projects would be based in part on what is currently allowed in existing CDBG Economic Development Reuse Plans, allowing retail businesses to remain eligible under these Revised Local Reuse Plans.

Thank you for comments regarding Economic Development Program Income. Grantees with an existing ED Local Reuse Plan will continue to have flexibility in determining eligible businesses under their plan. This would include allowing retail businesses to be eligible in an existing ED Local Reuse Plan.

In order to accomplish these objectives, and follow the intent of the use of Local CDBG Program Income, the Department is revising its guidance on CDBG Program Income as identified within the 2015 Annual Action Plan in order to better clarify the terms “continuing the same project activity”.

The revised language within the Appendix to the 2015-2019 Consolidated Plan and 2015 Annual Action Plan is noted below. This language will be incorporated into the final Consolidated Plan and Annual Action Plan information that is submitted to HUD. The language includes:

For the purposes of program income, “continuing the same project activity” will be defined as:

- ***For local governments with existing program income in an existing Local ED Revolving Loan Fund, or who are currently utilizing the NDO process, continuing the same project activity will include providing assistance for the same CDBG eligible activities as defined in the grantee’s new DED-approved Local Program Income Reuse Plan (also known as a Local Reuse Plan).***

- ***For newly awarded economic development grantees (including those units of general local government awarded new CDBG funds during the current Program Year for new CDBG eligible activities), program income that was generated from the use of CDBG funds for the above mentioned newly awarded activities may be deposited into an existing Local ED Revolving Loan Fund or a new Local ED Revolving Loan Fund. Any program income that is deposited in this manner, continuing the same project activity will include providing assistance to the same business for the same activity for which it was originally funded.***
- ***For newly awarded economic development grantees (including those units of general local government awarded new CDBG funds during the current Program Year for new CDBG eligible activities), program income that was generated from the use of CDBG funds for the above mentioned newly awarded activities may utilize the NDO process. In the instance where the NDO process is utilized, continuing the same project activity will include providing assistance for the same CDBG eligible activities as defined in the grantee's DED-approved Local Program Income Reuse Plan (also known as a Local Reuse Plan).***

Comment #3

The following is a summary of an oral comment given by Bellevue, NE City Administrator, Larry Burks:

Mr. Burks asked that the Nebraska Department of Economic Development give consideration to the unfunded FEMA mandates related to levee repairs in Nebraska as they will have a great impact on the economic development and community development potential for the State.

These unfunded mandates will not just affect the City of Bellevue, but they will also affect the cities of South Sioux City, Decatur, Blair, Plattsmouth, Lower Platte, Nebraska City and others along the Missouri River that are protected by levees. FEMA has mandated that many of the levees along the Missouri River be recertified after the 2011-2012 flooding. Although the levees held up to what many say is the five hundred year flood, FEMA is requiring that these levees be repaired or recertified at a cost of \$25 million for just the Bellevue Offutt community alone.

The City of Bellevue recognizes the necessity of addressing and funding these repairs, especially since the levees protect valuable assets such as the new Highway 34 and prime real estate. State participation is needed, however, to protect and preserve these assets.

Thank you for your comments. We appreciate your participation in the 2015-2019 Consolidated Plan and 2015 Annual Action Plan process and will take your comments into consideration.

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

No comments were received that were not accepted.

2. 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 2015-2019 Consolidated Plan and 2015 Annual Action Plan.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

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

Table 1 Responsible Agencies		
Agency Role	Name	Department/Agency
Lead Agency CDBG and HOME	State of Nebraska, Department of Economic Development	Nebraska Department of Economic Development/Housing and Community Development Division
ESG Program	State of Nebraska, Department of Health and	Nebraska Department of Health and Human Services/Division of Children and Family
HOPWA Program	State of Nebraska, Department of Health and	Nebraska Department of Health and Human Services/Division of Public

Narrative

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

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PR-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

DED and DHHS consulted with local governments, State agencies, non-profit organizations, and other members of the public on the preparation of the 2015-2019 Consolidated Plan and the 2015 Annual Action Plan.

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 (91.215(l))

The State worked at enhancing coordination between housing and service providers throughout the state. This was completed through consultation efforts made by DED and DHHS throughout the development of the Consolidated Plan. Some efforts for coordination included meeting with housing providers that included for-profit developers, members of the regional Development Districts; 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: 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.

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 purpose of the NHAP is to provide an overall “Continuum of Care” approach to address the needs of people who are homeless or are at risk of homelessness. To support the “Continuum of Care” approach, the Continuum of Care System is utilized. 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. The State coordinates directly with the Continuum of Care System on an ongoing basis by participating in Continuum meetings, leading strategic planning efforts, and supporting the Homeless Management Information system (HMIS) and CoC funding priorities.

To effectively help facilitate a cohesive statewide CoC network, NCHH established a State Continuum of Care Committee 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 in addressing the issues of the NCHH. 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 the persons who are homeless persons at risk of homelessness;
- 6) Serve as an advisory body to the NHAP.

The State CoC Committee is intricately 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 via conference call are conducted. Although NHAP is not a member of the NCHH or its State Continuum of Care Committee NHAP is attend 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.

As previously mentioned, two 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 and does not include the entitlement cities of Omaha and Lincoln. 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.

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

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. 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, the NCHH, and the Department of Health and Human Services, and other collaborating departments.

The NHAP works to involve input with the Continuum of Care System in the NHAP funding process. 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. An example of this input was NHAP consulting with the BoS in looking at options to best utilize funds for Rapid Rehousing and Homeless Prevention services. NHAP had proposed having one main provider for such services in each local region but the BoS, through each local regional CoC did not support the idea so NHAP did not pursue such change at that time. NHAP will continue to consult with the NCHH, the State CoC Committee and the CoC System related to NHAP allocations of funds across the state.

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, including the HEARTH Implementation Committee, HMIS subcommittee, the New/Project Renewal Performance Evaluation subcommittee and the Most Vulnerable Review Team.

The HEARTH Implementation Committee was created to: assist the BoS CoC in moving forward with updating the ESG Written Standards for the BoS CoC; address, develop, and implement the Coordinated Assessment System; and respond to HUD's policies on prioritization of chronic homeless. On June 10, 2015, an updated Written Standards for ESG/CoC Service Delivery was adopted. A copy is posted on the NHAP website at: [http://dhhs.ne.gov/children_family_services/Documents/NHAP \(ESG and HSATF\) Program Standards.pdf](http://dhhs.ne.gov/children_family_services/Documents/NHAP%20(ESG%20and%20HSATF)%20Program%20Standards.pdf). The Homeless Management Information System (HMIS) subcommittee is a standing committee under the BoS CoC designed to address training, technical support, and data quality.

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 CoC resources, assess the performance of funded programs, and make recommendations to the CoC on the reallocation of CoC resources.

The State also consults CoC System of Care on the development of HMIS policies and procedures as well as funding through multiple avenues. In August of 2014, a two day HMIS training was conducted, to bring together home and housing service providers, housing and homeless service funders, and HMIS providers from across the state to discuss and learn about the development of Nebraska's Coordinated Access System for the homeless. One of the significant outcomes from the training lead to adopting the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-

SPDAT) as the coordinated assessment tool for Nebraska. With the VI-SPDAT identified as the coordinated assessment tool, the BoS CoCs committed to piloting and testing the tool.

This effort then leads to the creation of 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).

NHAP utilizes ESG and HSATF to assist in funding the electronic system the CoC selected as the HMIS as well as the database administration entity. To ensure CoC involvement in the competitive funding process utilized for subgranting NHAP funds, the review and selection team for the procurement process is comprised solely of CoC representatives.

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

Several agencies, groups, organizations, and others were consulted during the development of the Consolidated Plan and the Annual Action Plan. Below is additional information on some of those entities that were consulted during the development stages of the planning process.

Housing Opportunities for Persons with AIDS (HOPWA) is located in the Nebraska Department of Health and Human Services, Division of Public Health. The Department is organized in to six Divisions; Behavioral Health, Developmental Disabilities, Medicaid, Public Health and Veteran’s Homes and Children and Family Services. This structure allows the program access to a variety of internal resources that support the delivery of HOPWA services. Within the Division of Public Health, HOPWA is co-located in the Infectious Disease Prevention Unit which also holds STD Prevention, Refugees Resettlement Program, Ryan White, HIV Prevention, Counseling and Testing, Hepatitis, Tuberculosis and HIV Surveillance. The location of the HOPWA Program in this Unit allows for information sharing, best practices for service delivery, and a collaborative environment for the focused strategies of Nebraska’s HOPWA Program.

To support the strategies of the HOPWA Program statewide, the program collaborates with a number of external partners: Lincoln Action Program, Local Community Action Agencies, Assistive Technology Partnership (ATP) and the ‘Nebraska RentWise Program’ (tenant education certification program), Nebraska AIDS Project, local Housing Authorities, Lutheran Family Services, Catholic Social Services and many others. HOPWA program staff are also actively involved in the Nebraska Red Ribbon Community which exists to improve the quality of life of those people with HIV or living with AIDS through leadership, education and partnerships. The Nebraska HIV Care & Prevention

Consortium (NHCP) which is a cooperative agreements awarded to Nebraska by the Health Resources Services Administration (HRSA) and the Centers for Disease Control and Prevention (CDC) and whose membership focuses on strengthening the action of public health programs to clearly identify the risk characteristics of those persons who are most at risk for HIV infection or who are currently infected and pose a threat to others through transmission and to determine the type of prevention activities to implement.

Nebraska's HOPWA Program had participated in both the Statewide Continuum of Care Committee and the Plan to End Chronic Homelessness Ad Hoc Committee which was established in 2003. Due to committee member's work priorities, the committees had not been meeting recently but collaborations/communications continued. The collaborative efforts from both committees were beneficial in ensuring the special needs of persons living with HIV/AIDS in Nebraska were represented at both the regional and the state level planning processes. It is expected that both of the committees will resume in 2015.

Nebraska AIDS Project (NAP) case managers provide HOPWA services in their respective areas of the state and are members of their local Continuum of Homelessness Consortia. The statewide coverage of NAP's case managers and their participation in local organization/groups, allows for collaboration with a number of critical agencies whose focus is on housing and homelessness. The NAP offices located in Scottsbluff, Kearney and Norfolk have strong working relationships with the various Housing Authority agencies that provide services in the surrounding counties. NAP's continued outreach and identifying new services and partners has proven to be successful in connecting NAP staff and clients to resources that were previously unknown.

In addition, the State worked with a wide range of homeless service providers; CoCs; and other interested parties in coordination with the Nebraska Commission on Housing and Homelessness in the development of "Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska" (For a complete copy see also the Appendix). The Plan allows for collaboration between federal, state, and local partners who are assisting homeless populations throughout the state and includes: an evaluation of past performance; goal setting for the next 10 years; and developing a comprehensive strategy for ending homelessness, particularly in areas such as chronic homelessness, Veterans homelessness, and homelessness for families, youth, and children. It is the goal of the State to review the Plan, and utilize elements of it, in order for the State to move forward with a coordinated effort to address homelessness.

Below is a list and details of several agencies, groups, and organizations that were consulted during the consolidated planning process.

Table 2 Agencies, groups, organizations who participated			
Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Region 1 Panhandle	Continuum of Care	Homelessness Strategy	Consulted through E-mail and Phone Calls
Region 2 North Central	Continuum of Care	Homelessness Strategy	Consulted through E-mail and Phone Calls
Region 3 Southwest	Continuum of Care	Homelessness Strategy	Consulted through E-mail and Phone Calls
Region 4 Southeast	Continuum of Care	Homelessness Strategy	Consulted through E-mail and Phone Calls
Region 5 Northeast	Continuum of Care	Homelessness Strategy	Consulted through E-mail and Phone Calls
PATH	DHHS Behavior Health	Homelessness Strategy	Consulted through Meeting in-person, E-mail and Phone Calls
State CoC	CoC Stakeholders and Human Services Professionals	Homelessness Strategy	Consulted through Phone calls
Association of Home Builders	Non-Profit Organization	All Sections	Consulted through Email
CDBG Certified Administrators	Various	All Sections	Consulted through Email, through phone calls, and in person.
Nebraska Commission on Housing and Homelessness	Commission	All Sections	Consulted through Email, through phone calls, and in person.
Nebraska Community Action Agencies	Social Services and Non-Profit Organizations	All Sections	Consulted through Email
Nebraska County Clerks	Government	All Sections	Consulted through Email

Nebraska Economic Developers Association	Professional Association	All Sections	Consulted through Email, through phone calls, and in person.
Nebraska Housing Authorities	Housing Authorities	All Sections	Consulted through Email
Nebraska Housing Developers Association	Professional Association	All Sections	Consulted through Email, through phone calls, and in person.
Nebraska League of Municipalities	Non-Profit Organization	All Sections	Consulted through Email
Nebraska Regional Officials Council (NROC)	Council	All Sections	Consulted through Email
First Class Nebraska Cities	Government	All Sections	Consulted through Email, through phone calls, and in person.
Second Class Nebraska Cities	Government	All Sections	Consulted through Email, through phone calls, and in person.
Nebraska Villages	Government	All Sections	Consulted through Email, through phone calls, and in person.
Non-Profit organizations	Various	All Sections	Consulted through Email, through phone calls, and in person.
For Profit Developers	Various	All Sections	Consulted through Email, through phone calls, and in person.
Nebraska Investment Finance Authority (NIFA)	Quasi-Government	All Sections	Consulted through Email, through phone calls, and in person.
Community Housing Development Organizations (CHDOs)	Various	All Sections	Consulted through Email, through phone calls, and in person.

Table 2 – Agencies, groups, organizations who participated (Continued)

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

When developing the Consolidated Plan, the State consulted with all agencies that the State felt would provide relevant information for the Plan. 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 information 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?
Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska, 2015-2025	Nebraska Commission on Housing and Homelessness	Various homeless assistance providers, in consultation with CoCs; consultants; federal and state partners; housing developers; and other interested parties developed the 10 Year Plan that can be utilized in coordination with the State’s Consolidated Plan and AAP in helping coordinate efforts, funding, and priorities among different programs aimed at ending homelessness.
City of Omaha Comprehensive 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 Comprehensive 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 Comprehensive 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.

Table 3 – Other local / regional / federal planning efforts

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

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

might be utilized as well as HOME, ESG, and HOPWA resources (which are available within the Entitlement Communities as well).

Narrative (optional):

The information above provides a description of the coordination and consultation efforts made by the State.

PR-15 Citizen Participation - 91.115, 91.300(c)

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

The State of Nebraska developed a Citizen Participation Plan in order to establish the citizen participation efforts that would be carried out through the five year Consolidated Plan. The State understands the importance of public participation (including consultation with advisory groups) in the consolidated planning process. The Citizen Participation Plan seeks to provide and encourage the participation of Nebraska citizens in the development of the Consolidated Plan; Substantial Amendments to the Consolidated Plan; each Annual Action Plan, and the Annual Performance Report. Emphasis is placed on encouraging participation and involvement by low and moderate income persons; residents of low and moderate income areas; residents of slums and blighted areas; individuals and organizations located where federal and state resources may be used; minorities and non-English speaking residents (including those with Limited English Proficiency); and persons with disabilities.

The complete Citizen Participation Plan was placed on the DED website within the “2015-2019 Consolidated Plan Information” section at:

<http://neded.org/consolidatedplan>

In addition, the complete Citizen Participation Plan was also translated in Spanish, titled “Propuesto Plan de Participación Ciudadana 2015-2019,” and placed on the DED website within the “2015-2019 Consolidated Plan Information” section at:

<http://neded.org/consolidatedplan>

Beginning in the summer of 2014, a Community Needs Survey was developed and distributed throughout the state. This Survey was emailed to numerous members of the public that included: local officials, CoC representatives, housing advocates, developers, Development Districts, and other members of the public and was also placed on the Department’s website. In addition, the Community Needs Survey was translated into Spanish as “Necesidades de la Comunidad Encuesta” and was emailed to Marta Sonia Londono Mejia, the DED Latino Business Consultant; various members of the public; and was placed on the Department’s website as “Necesidades de la Comunidad Encuesta-Versiones en Español en PDF”. Both versions of the Survey are available on the Department’s website at:

http://www.neded.org/files/crd/consolidated_plan/2015_2019_Survey_for_Proposed_Con_Plan.pdf

And

http://www.neded.org/files/crd/consolidated_plan/2015_2019_Necesidades_de_la_Comunidad_Encuesta_Espanol.pdf

Once survey responses were received, DED reviewed those responses in order to determine what priorities members of the public emphasized throughout the state. This information was then presented during focus groups meetings that were held during the summer and fall of 2014. These formal and informal focus groups were held prior to finalizing the Proposed Consolidated Plan.

Outreach efforts included: meetings with the Nebraska Development Districts; meetings with various local community leaders and members; meetings with Youth Groups; a meeting with the Substance Abuse and Behavioral Health Advisory Committee; and the Nebraska Commission on Housing and Homelessness (the State's official advisory committee).

The information from the survey results and the focus groups assisted in the development of the Proposed Consolidated Plan and Annual Action Plan (the draft of these documents) that was presented to the public during the winter of 2014-2015. Information on the Proposed Consolidated and Annual Action Plan was placed on the DED website at:

<http://neded.org/consolidatedplan>

Survey results were also further evaluated prior to the finalization of the Consolidated Plan and Annual Plan and discussion/evaluation information were added to the final plan information within various sections.

A formal public comment period opened January 5, 2015 and continued through February 6, 2015 for the Consolidated Plan, the Citizen Participation Plan, and the 2015 Annual Action Plan. Public meetings, covering geographic areas throughout the state were conducted at the following locations:

January 7, 2015, 10:00 am-12:00 pm, Central Time

Nebraska Education Telecommunications (NET), Main Board Room, 1800 N 33rd Street, Lincoln, NE
Chadron State College, Admin 031, Room, 10th & Main, Chadron, NE
Hastings Public Library, 2nd Floor, 517 West 4th St., Hastings, NE
Wayne State College, NATS Conference Room, 1111 Main St., Wayne, NE

January 15, 2015, 1:00 pm-3:00 pm, Central Time

Nebraska Education Telecommunications (NET), Main Board Room, 1800 N 33rd Street, Lincoln, NE
Columbus Public Library, Columbus Rm, 2nd floor, 2504 14th St., Columbus, NE
Grand Island Public Library, 211 N Washington St., Grand Island, NE
Voc Rehab Norfolk, 1212 West Benjamin Avenue, Norfolk, NE
Educational Service Unit #16 Distance Learning Rm., 1221 W 17th St., North Platte, NE

A news release, announcing the comment period and public meetings, was sent to media statewide and notices were sent to approximately 2,000 contacts including: the Nebraska Commission on

Housing and Homelessness (NCHH); the Nebraska Investment Finance Authority; the Nebraska Housing Developers Association membership; Public Housing Authorities; City and Village officials; County officials; Development Districts; CoC contacts; the League of Nebraska Municipalities; State Senators; Congressional Delegates; and CDBG Administrators.

Public notices were placed in a number of newspapers throughout the state that included: the Scottsbluff Herald; the North Platte Telegraph; the Norfolk Daily News; the Lincoln Journal Star; the Grand Island Independent; the Beatrice Daily Sun; the Kearney Daily Hub; and the Chadron Record.

The Proposed 2015-2019 Consolidated Plan, the Proposed Citizen Participation Plan, and the Proposed 2015 Annual Action Plan were available at the public meetings and were posted on the DED website at:

<http://neded.org/consolidatedplan>

In order to increase opportunities for public participation and public comment, the Proposed Plans were sent to 16 libraries throughout Nebraska that included:

- Alliance Public Library, 1750 Sweetwater St., Alliance, NE
- Auburn Memorial Library, 1810 Courthouse Ave., Auburn NE
- Bennett Martin Public Library, 136 S. 14th St., Lincoln, NE
- Central City Public Library, 1604 15th Ave., Central City, NE
- Chadron Public Library, 507 Bordeaux St., Chadron, NE
- Garfield County Library, 110 S. 7th St., Burwell, NE
- Goodall City Library, 203 W. "A" St., Ogallala, NE
- Jensen Memorial Library, 443 N. Kearney, Minden, NE
- Lexington Public Library, 907 N. Washington St., Lexington, NE
- McCook Public Library, 802 Norris Ave., McCook, NE
- Scottsbluff Public Library, 1809 3rd St., Scottsbluff, NE
- Sidney Public Library, 1112 12th Ave., Sidney, NE
- Thomas County Library, 501 Main St., Thedford, NE
- Valentine Public Library, 324 N. Main St., Valentine, NE
- Wayne Public Library, 410 Pearl St., Wayne, NE
- W. Dale Clark Library, 2015 S. 15th St., Omaha, NE

In addition, a "Summary of Public Comments" will be made available to the public and posted on the DED website within the Final Consolidated Plan and Annual Action Plan.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The methodology utilized for the Consolidated Plan provides pre-populated tables from various sources of information. Most of the information was gathered from the American Community Survey (ACS). The ACS is based on (and has replaced) the long form questionnaire formerly used in the Decennial Census. This ACS data refers to 1, 3, and 5-year estimates.

In a review of these estimates, the State determined that some of the most common housing problems included: the number of rental units for low income persons; cost burden; and appropriate services for special needs populations within some areas of the state. Other significant needs are also identified within the following information.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a, b, c)

Summary of Housing Needs

The Housing Needs Assessment is based on data provided by HUD through Comprehensive Housing Affordability Strategy (CHAS) data and supplemental U.S. Census data. This data provides a glimpse of the housing needs throughout the state. This data, along with consultations with housing service providers and developers, provides a snapshot of the housing needs in Nebraska. The following table provides an overview of the data.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	1,711,263	1,813,061	6%
Households	666,995	715,703	7%
Median Income	\$39,250.00	\$50,695.00	29%

Table 4 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

The following tables, with the exception of the Housing Needs Table, are automatically HUD-generated tables within the IDIS eCon Planning Suite using CHAS data and Census data. The term "HAMFI" refers to "HUD Adjusted Median Family Income," which is the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and Income Limits for HUD Programs.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	80,570	85,055	133,215	79,715	337,145
Small Family Households *	21,045	23,575	44,250	32,320	189,335
Large Family Households *	4,705	5,805	11,610	8,180	30,175
Household contains at least one person 62-74 years of age	9,790	14,770	22,190	13,400	56,560
Household contains at least one person age 75 or older	15,385	20,190	19,920	7,930	20,950
Households with one or more children 6 years old or younger *	14,915	13,930	23,720	15,290	38,045
* the highest income category these types is HAMFI					

Table 5 - Total Households Table

Data Source: 2007-2011 CHAS NOTE: HAMFI (HUD Area Median Family Income)

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	2,175	990	965	320	4,450	445	300	285	115	1,145
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	650	545	275	125	1,595	15	60	240	210	525
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,595	1,415	1,450	480	4,940	470	775	1,245	670	3,160
Housing cost burden greater than 50% of income (and none of the above problems)	29,900	6,920	1,475	205	38,500	14,030	9,025	6,360	1,320	30,735
Housing cost burden greater than 30% of income (and none of the above problems)	8,145	19,775	11,450	865	40,235	5,730	12,000	20,175	10,045	47,950
Zero/negative Income (and none of the above problems)	2,965	0	0	0	2,965	1,765	0	0	0	1,765

Table 6 – Housing Problems Table

Data Source: 2007-2011 CHAS

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	34,320	9,870	4,165	1,125	49,480	14,955	10,165	8,130	2,315	35,565
Having none of four housing problems	16,870	33,475	52,375	23,410	126,130	9,690	31,550	68,545	52,870	162,655
Household has negative income, but none of the other housing problems	2,965	0	0	0	2,965	1,765	0	0	0	1,765

Table 7 – Housing Problems 2

Data Source: 2007-2011 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	12,890	9,840	4,135	26,865	4,390	6,085	11,520	21,995
Large Related	2,690	1,595	650	4,935	1,250	1,965	2,605	5,820
Elderly	7,285	5,605	2,780	15,670	10,365	9,720	6,460	26,545
Other	18,845	11,100	5,785	35,730	4,325	3,805	6,225	14,355
Total need by income	41,710	28,140	13,350	83,200	20,330	21,575	26,810	68,715

Table 8 – Cost Burden > 30%

Data Source: 2007-2011 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	10,555	2,115	185	12,855	3,575	3,175	2,800	9,550
Large Related	2,060	415	80	2,555	1,000	810	385	2,195
Elderly	5,085	2,155	1,140	8,380	6,355	3,280	1,860	11,495
Other	15,015	2,680	270	17,965	3,470	1,890	1,415	6,775
Total need by income	32,715	7,365	1,675	41,755	14,400	9,155	6,460	30,015

Table 9 – Cost Burden > 50%

Data Source: 2007-2011 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	2,040	1,735	1,430	475	5,680	430	625	1,140	685	2,880
Multiple, unrelated family households	180	170	250	100	700	54	179	315	130	678
Other, non-family households	100	105	60	35	300	0	34	34	65	133
Total need by income	2,320	2,010	1,740	610	6,680	484	838	1,489	880	3,691

Table 10 – Crowding Information – 1/2

Data Source: 2007-2011 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 11 – Crowding Information 2/2

Data Source: 2007-2011 CHAS

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

A significant number of single person households, particularly those who are low income and have special needs, are in the need of housing assistance. At the time of the development of this draft proposal, specific estimates were not available.

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

A significant percentage of households with a disabled family member are in need of housing assistance. According to the CHAS 2008-2010 data, of the households with a hearing or vision impaired family member, 31% (24,070) have one of four housing problems (lacks kitchen or complete plumbing, severe overcrowding, or severe cost burden). Of the households with an ambulatory limited family member, 37% (30,680) have one of four housing problems. Of the households with a cognitive limited family member, 41% (22,080) have one of four housing problems. Of the households with a self-care or independent living limited family member, 39% (23,270) have one of four housing problems.

There are also a significant number of victims of domestic violence, dating violence, sexual assault and stalking that are in need of housing assistance. According to the 2014 Domestic Violence Counts, there were approximately 79 victim requests for housing unmet on a daily basis because the programs did not have the resources to provide these services.

What are the most common housing problems?

The most common housing problem in Nebraska is cost burden. A household is cost burdened when housing costs are greater than 30 percent of the household income. Approximately 223,685 households in Nebraska are cost burdened. The majority of cost burdened households (56 percent) are renters. The majority of cost burdened renters (59 percent) are at 0%-30% of the AMI (Area Median Income), 28 percent are at 30%-50% of the AMI, and 13 percent are at 50%-80% of the AMI. Of the cost burdened households, 44 percent are home owners.

Approximately 35 percent of the cost burdened home owners are at 0%-30% of the AMI, 31 percent are at 30%-50% of the AMI, and 33 percent are at 50%-80% of the AMI. Of the households that are cost burdened, approximately 71,770 households are considered "severely cost burdened" or having housing costs greater than 50 percent of household income. A vast majority of severely cost burdened renters (78 percent) are in the 0%-30% AMI range, whereas 48 percent of severely cost burdened home owners fall within this range.

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

Households with lower incomes are more likely to have at least one severe housing problem (such as lacks kitchen or complete plumbing, severe overcrowding, or severe cost burden). Approximately 89 percent of renters and 71 percent of home owners with severe housing problems are at 0%-50% of the AMI.

Crowding is an issue for 10,371 households in Nebraska. Crowding is when there is more than one person per room. The majority of households with a crowding issue are renters (64 percent). Crowding is also an issue that is more likely to affect those with lower incomes. Of the renters with crowding, 65 percent are below 50 percent of the AMI.

These lower income households often contain the elderly and young children. Households that contain at least one person age 75 or older and households with one or more children 6 years old or younger earn an income lower than the HAMFI (HUD Area Median Family Income) more often than other households. Approximately 66 percent of households that contain at least one person age 75 or older and 49 percent of households with one or more children 6 years old or younger have an income of less than 80 percent of the HAMFI. In comparison, approximately 40 percent of total households in Nebraska have an income of less than 80 percent of the HAMFI.

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

A significant amount of clients seeking assistance have mental illness and/or addictions. Specifically within the Veterans being served, once employment has been secured, the challenge is to try and keep the Veteran from losing employment. Because many Veterans experience triggers which can cause emotional upheaval, leading them back down into their substance abuse, maintaining employment can be difficult. If they are at their end of the assistance period, it may put them back into homelessness, beginning the cycle all over again. For Low-income families with children trying to find adequate employment, having a very low unemployment rate in the state compared to the National average is problematic. What is typically found in rural Nebraska is that the wage and number of hours that a person is offered may be minimum wage, part time with no benefits. The challenge is in trying to find employment that provides enough money to pay rent, which is high because of the limited supply and high demand of housing. An additional obstacle in trying to secure and maintain employment comes from the lack of public transportation.

The Balance of State CoC meets on a regular basis for strategic planning to address the needs and gaps in services in the local regions and work towards developing regional plans to end homelessness. One of the primary interventions identified and utilized by the CoC to end all forms of homelessness is to maximize the usage of the Rapid Re-Housing intervention. The NHAP and the BoS PSH work together to complement Rapid Re-Housing work with Rental Assistance Permanent Support Housing through the CoC.

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.

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

Not applicable under the State's ESG Program. The State of Nebraska does not provide estimates of its at-risk population.

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

Persons threatened with homelessness include a variety of populations. For extremely low income households struggling to escape homelessness, a variety of supportive services are needed including rental/mortgage assistance; security deposit and utility assistance; transportation; financial management; day care; job counseling; substance abuse counseling; and medical services.

Discussion

See the above mentioned narrative for additional information.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

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

Introduction

A disproportionately greater housing need is defined by HUD when a racial or ethnic group experiences housing problems at a rate greater than 10 percent more than for the income level as a whole. The 2007-2011 CHAS data table below summarizes the percentage of each racial/ethnic group experiencing housing problems at the HUD Adjusted Median Family Income (HAMFI) levels. Overall housing problems include: housing units lacking complete kitchens and plumbing facilities; overcrowding; and cost burden.

The tables below identify a variety of indicators as related to disproportionately greater need among racial and ethnic groups.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	63,590	14,162	4,327
White	48,586	11,505	3,242
Black / African American	7,209	1,370	539
Asian	850	128	168
American Indian, Alaska Native	1,073	249	19
Pacific Islander	149	0	0
Hispanic	4,435	642	290

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	50,926	34,667	0
White	41,180	30,018	0
Black / African American	3,286	1,456	0
Asian	679	324	0
American Indian, Alaska Native	369	271	0
Pacific Islander	34	65	0
Hispanic	4,605	2,001	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	43,051	90,522	0
White	35,929	78,949	0
Black / African American	2,056	3,328	0
Asian	618	679	0
American Indian, Alaska Native	201	497	0
Pacific Islander	0	20	0
Hispanic	3,709	6,249	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	14,651	68,214	0
White	12,674	60,814	0
Black / African American	446	2,045	0
Asian	151	635	0
American Indian, Alaska Native	130	167	0
Pacific Islander	50	104	0
Hispanic	1,095	3,896	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

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

Discussion

Households in many racial and ethnic groups more often have housing problems than their jurisdictions as a whole. Among households that are 0%-30% of the AMI, Black/African Americans, American Indian/Alaska Natives, Pacific Islanders, and Hispanics have a greater percentage of households with one or more of four housing problems* than the 77 percent of the jurisdiction as a whole that has housing problems [79 percent, 80 percent, 100 percent and 82 percent respectively]. Among households that are 30%-50% of the AMI, Black/African Americans, Asians, and Hispanics have a greater percentage of households with one or more of four housing problems than the 59 percent of the jurisdiction as a whole that has housing problems [69 percent, 67 percent, and 69 percent respectively]. Among households at 50%-80% of the AMI, Black/African Americans, Asians, and Hispanics have a greater percentage of households with one or more of four housing problems than the 32 percent of the jurisdiction as a whole that has housing problems [38 percent, 47 percent, and 37 percent respectively]. Finally, among households with 80%-100% of the AMI, American Indian/Alaska Natives, Pacific Islanders, and Hispanics have a greater percentage of households with one or more of four housing problems than the 18 percent of the jurisdiction as a whole that has housing problems [43 percent, 33 percent, and 21 percent respectively]. Hispanics were the only group to have a greater percentage of households with one or more of four housing problems in all of the jurisdictions.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

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

Introduction

HUD defines disproportionately greater need for severe housing problems when a racial or ethnic group experiences severe housing problems at a rate greater than 10 percent more than for the income level as a whole. The distinction between housing problems and severe housing problems is based on the degree of cost burden and overcrowding. Severe housing problems include: housing units lacking complete kitchen or plumbing facilities; overcrowding; and a cost burden greater than 50%.

The tables below describe further details on severe housing problems as they relate to ethnic or racial groups throughout the state.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	48,841	29,067	4,327
White	37,146	23,115	3,242
Black / African American	5,650	2,929	539
Asian	712	256	168
American Indian, Alaska Native	850	453	19
Pacific Islander	149	0	0
Hispanic	3,429	1,646	290

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,122	66,475	0
White	15,190	56,005	0
Black / African American	1,173	3,583	0
Asian	236	767	0
American Indian, Alaska Native	155	480	0
Pacific Islander	10	84	0
Hispanic	2,164	4,467	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,850	121,739	0
White	8,955	105,959	0
Black / African American	543	4,839	0
Asian	371	931	0
American Indian, Alaska Native	132	575	0
Pacific Islander	0	20	0
Hispanic	1,770	8,200	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,633	79,044	0
White	2,637	70,637	0
Black / African American	39	2,456	0
Asian	94	688	0
American Indian, Alaska Native	96	203	0
Pacific Islander	50	104	0
Hispanic	697	4,302	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

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

Discussion

Households in many racial and ethnic groups more often have severe housing problems than their jurisdictions as a whole. Among households that are 0%-30% of the AMI, Black/African Americans, Asians, American Indian/Alaska Natives, Pacific Islanders, and Hispanics have a greater percentage of households with one or more of four severe housing problems* than the 59 percent of the

jurisdiction as a whole that has severe housing problems [62 percent, 63 percent, 64 percent, 100 percent and 64 percent respectively]. Among households that are 30%-50% of the AMI, Black/African Americans, Asians, American Indian/Alaska Natives, and Hispanics have a greater percentage of households with one or more of four severe housing problems than the 22 percent of the jurisdiction as a whole that has severe housing problems [25 percent, 24 percent, 24 percent and 33 percent respectively]. Among households at 50%-80% of the AMI, Black/African Americans, Asians, American Indian/Alaska Natives, and Hispanics have a greater percentage of households with one or more of four severe housing problems than the 9 percent of the jurisdiction as a whole that has severe housing problems [10 percent, 28 percent, 19 percent and 18 percent respectively]. Finally, among households with 80%-100% of the AMI, Asians, American Indian/Alaska Natives, Pacific Islanders, and Hispanics have a greater percentage of households with one or more of four severe housing problems than the 4 percent of the jurisdiction as a whole that has severe housing problems [12 percent, 32 percent, 32 percent, and 21 percent respectively].

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

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

Introduction

HUD defines a disproportionately greater need regarding housing cost burdens when a racial or ethnic group experiences housing cost burdens at a rate greater than 10 percent more than for the income level as whole. The tables below summarize information as it relates to housing cost burdens among racial or ethnic groups throughout the state.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	519,602	107,381	73,547	4,502
White	467,674	90,288	58,906	3,356
Black / African American	13,584	6,104	6,609	569
Asian	6,113	1,204	1,096	178
American Indian, Alaska Native	2,502	591	805	19
Pacific Islander	354	109	119	0
Hispanic	24,345	6,752	4,341	310

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion

Black/African American households spend a greater percentage of their income on housing than all other racial or ethnic group. There are many racial and ethnic groups, however, that disproportionately spend a greater percentage of their income on housing than the jurisdiction as a whole. There are fewer Black/African American, Asian, American Indian/Alaska Native, Pacific

Islander, and Hispanic households that spend less than or equal to 30 percent of their income on housing than the 74 percent of the jurisdiction as a whole that spends less than or equal to 30 percent of their income on housing [51 percent, 71 percent, 64 percent, 61 percent, and 68 percent respectively]. There are more Black/African American, Pacific Islander, and Hispanic households that spend between 30-50 percent of their income on housing than the 15 percent of the jurisdiction as a whole that spends between 30-50 percent of their income on housing [23 percent, 19 percent, and 19 percent respectively]. There are more Black/African American, Asian, American Indian/Alaska Native, Pacific Islander, and Hispanic households that spend more than 50 percent of their income on housing than the 10 percent of the jurisdiction as a whole that spends more than 50 percent of their income on housing [25 percent, 13 percent, 21 percent, 20 percent, and 12 percent respectively].

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

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

Black/African American and Hispanic households often experience housing problems at a greater percentage than white households. Approximately 9 percent of white households in Nebraska experience housing problems, whereas 19 percent of Black/African American and 15 percent of Hispanic households experience housing problems. Black/African American households also have disproportionately greater need at lower income levels. While 3 percent of all households with one or more housing problem between 80%-100% AMI are Black/African American, 5 percent of those at 50%-80% AMI, 6 percent of those at 30%- 50% AMI, and 11 percent of those at 0%-30% AMI are Black/African American households.

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

All of the known needs were identified through the CHAS data, U.S. Census data, surveys, and focus group discussions. The majority of the needs were previously known from past experience and from past Strategic Plans and from a review of the AI.

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

There are numerous areas throughout the state, some of which have concentrations of racial and ethnic groups. The State is relatively diverse in its racial and ethnic composition in the larger cities throughout the state, and less diverse in some of the less populated rural areas.

NA-35 Public Housing – (Optional)

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.

The information below has been prepopulated, and the State has assumed the data accurately reflects the PHAs assistance programs. The narrative questions below are answered only from the perspective of DED serving as a potential financier of PHA projects.

Totals in Use

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

Table 21 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

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

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

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

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

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

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

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

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The State of Nebraska DED, nor DHHS, own or operate public housing units directly and therefore does not maintain or oversee such waiting lists.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance?

The State of Nebraska DED nor DHHS own or operate public housing units directly and therefore does not maintain or oversee such waiting lists.

Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

DED has previously funded some PHA projects and understands that there continue to be long waiting lists in some jurisdictions which means there are not enough available resources to assist all the persons in need of public housing.

How do these needs compare to the housing needs of the population at large?

The State of Nebraska DED nor DHHS own or operate public housing units directly, but the need for affordable housing is common throughout the state and this is true for those within public housing, those trying to obtain public housing, and other low-income persons throughout the state.

Discussion:

The State, although not a direct operator of public housing units, understands a significant need for public housing exists throughout the state and that many persons seeking public housing assistance cannot be served due to a lack of resources and the availability of units. The State will continue to work with PHAs in determining whether or not additional State resources might be available.

NA-40 Homeless Needs Assessment – 91.305(c)

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Introduction:

The following data comes from the 2014 Nebraska PIT Report which represents the BoS Regions. This information does not reflect Lincoln or Omaha, ESG entitlement cities receiving ESG directly from HUD. The homeless count from this report is based on the physical snapshot count

accomplished in January of 2014. While the data provides basic information to be used and extrapolated, it is by no means a scientifically exact number. Based on the recent Point-in-Time count, at least 560 people were counted as homeless in the BoS Regions.

Nebraska Balance of State CoC – 500 Homeless Needs Assessment

	Estimate # of persons experiencing homelessness on a given night (1)		Estimate the # experiencing homelessness each year (2)	Estimate the # becoming homeless each year (3)	Estimate the # exiting homelessness each year (4)	Estimate the # of days persons experience homelessness (5)
	Sheltered	Unsheltered				
Persons in HH w/Adults & Children	523	37	1,317	688	527	Mean = 78 days Median = 13
Persons in HH w/Only Children	190	2	53	14	44	Mean = 38 days Median = 21
Persons in HH w/Only Adults	333	35	352	178	147	Mean = 28.5 days Median = 8
Chronically Homeless Individuals	51	11	65	N/A	N/A	Mean = 25 days Median = 12
Chronically Homeless Families	4	0	16	N/A	N/A	Mean = 23 days Median = 10
Veterans	21	9	81	24	28	Mean = 37 days Median = 19
Unaccompanied Child	0	0	53	14	44	Mean = 38 days Median = 21
Persons w/HIV	0	0	N/A	N/A	N/A	N/A

- 1) *Estimates of persons experiencing homelessness on a given night* are reported from the Nebraska 500 BOS CoC 2014 Homeless Point in Time Count conducted on January 23rd, 2013
- 2) *Estimates of persons experiencing homelessness each year* are generated from the Annual Homeless Assessment Report (AHAR) and analysis of HMIS entry data. Each is based upon HMIS data.
- 3) *Estimates of persons becoming homeless each year* are generated from a modified PULSE report and also based upon HMIS data. Data for chronically homeless subpopulations was found to be not sufficiently reliable to report for these estimates.

- 4) *Estimates of persons exiting homelessness* are generated from Entry/Exit HMIS data over a 24 month period using exits from shelter/housing in the first 12 month period and no re-entry to shelter/housing in the subsequent 12 months period.
- 5) *Estimates of days persons experience homelessness* are the average Length of Stay in shelter or transitional housing during a 12 month period of time.

Nature and Extent of Homelessness: (Optional)

The following is information on Race and Ethnicity as it relates to the homeless population.

Ethnicity					
	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Non-Hispanic/Non-Latino	179	262	0	28	469
Hispanic/Latino	24	58	0	9	91

Race					
	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	174	285	0	36	495
Black or African-American	8	11	0	1	20
Asian	0	1	0	0	1
American Indian or Alaska Native	19	9	0	0	28
Nat Hawaiian or Other Pacific Islander	0	1	0	0	1
Multiple Races	2	13	0	0	15

Source: Nebraska PIT Count BoS 2014

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

Based on previous Point-in-Time (PIT) Counts and Service availability, the homeless unsheltered numbers have continued to show a reduction, while numbers for homeless sheltered individuals remains fairly consistent. The number of chronically homeless families was significantly less than what has been reported in past. Additionally, it is estimated that 27 Veterans were identified as homeless sheltered; the majority of the individuals in the Veterans count were White, Non-Hispanic males.

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

Based on the numbers reported from the PIT: 88.39% were white, 5.00% were American Indian or Alaska Native, 3.57% were African-American, 2.67% reported Multiple Races, and 1% reported either as Asian, or Native Hawaiian or Other Pacific Islander. Specific to ethnicity, the majority of individuals (83.75%) were identified as Non-Hispanic/Non-Latino, whereas 16.25% individuals were identified as Hispanic/Latino.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Based on the numbers reported from the PIT, 37 individuals (6.6%) were unsheltered at that time. The geographic area within the BoS is large and rural. Subsequently, the availability of affordable, decent permanent housing for persons experiencing homelessness is limited. Often access to transportation adds another barrier for homeless clients trying to regain stability, find employment and secure descent housing.

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.

Discussion:

See above for additional information.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

There are a number of non-homeless persons with special needs throughout the state. A description of some of those persons, and their needs are addressed below.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	1,860
Area incidence of AIDS	53
Rate per population	3
Number of new cases prior year (3 years of data)	213
Rate per population (3 years of data)	4

Table 25 – HOPWA Data

Data Source: CDC HIV Surveillance

NOTE: No HIV Data Reported for NE for CY 2013; NE Surveillance Reports 58 new HIV Cases in CY 2013

Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	1,860

Area Prevalence (PLWH per population)	98
Number of new HIV cases reported last year	84

Table 25 – HOPWA Data (Continued)

Data Source: CDC HIV Surveillance

NOTE: No HIV Data Reported for NE for CY 2013; NE Surveillance Reports 58 new HIV Cases in CY 2013

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	380
Short-term Rent, Mortgage, and Utility	250
Facility Based Housing (Permanent, short-term or transitional)	40

Table 26 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Persons with special needs include: the elderly and frail elderly, persons with severe mental illness, persons developmentally disabled, persons with physical disabilities, persons with alcohol/other drug addictions, and persons with HIV/AIDS. The segments of these populations requiring special housing options have not been quantified. Many persons with these special needs also have very low incomes. Therefore, their needs may have already been taken into account in estimating the housing needs of persons with very low incomes. However, for some people supportive housing—housing with supportive services—is needed as they are unable to undertake the activities of daily living without assistance.

Supportive housing is defined as residential units that provide a range of services needed for the resident to achieve personal goals. Various subpopulations with special needs require supportive housing. Below is further discussion of the needs of these subpopulations.

Elderly and Frail Elderly-Elderly persons may need housing assistance (both financial and supportive) when they may have one or more limitations on activities of daily living. This may include assistance to perform routine daily activities and may include supportive housing for those elderly persons who are low income or very low income. In 2012, 24% of all households housed one or more elderly persons. Approximately 17% of those households contained persons that were considered “Frail Elderly” (according to the CHAS data sets, persons that are 75 years and older are referred to as “Frail Elderly”.) Of those households with elderly persons, approximately 25% had one of four housing problems (lacks kitchen or complete plumbing, severe overcrowding, or severe cost burden.)

Persons with Severe Mental Illness-Severe mental illness include the diagnosis of psychoses and the major affective disorders including bi-polar disorder and major depression. An individual’s

conditions may be chronic, meaning it has existed for at least one year and meets the HUD definition for a disability. Approximately 81,000 persons in Nebraska live with severe mental illness. Many of these individuals rely on Supplemental Security Income (SSI) because their mental illness prevents them from employment. The average cost of a studio apartment in Nebraska is 73% of the average SSI payment, making housing unaffordable for many living with a severe mental illness in the State. Needs for this population may include both financial and supportive services depending on the needs of the individual. Financial support may be needed for those low or very low income persons. Supportive services may be needed for those persons that may be unable to fully care for themselves and may include supportive housing and other needed services.

Persons Developmentally Disabled-There are approximately 53,853 households in Nebraska with a developmentally disabled family member. Of those households, approximately 41% have 1 of 4 housing problems. While not all persons who are developmentally disabled will require supportive housing, those that cannot live with supportive family and are unable to fully care for themselves will require supportive housing and/or services. Needs for this population may also include financial services depending on the needs of the individual. Financial support may be needed for those low or very low income persons.

Persons with Physical Disabilities-In Nebraska, the number of individuals with disabilities is expected to increase due to an increase in life expectancy and the aging of the baby boomers. The overall rate of disabilities in a population increases with age as seniors (65 and over) may report having at least one disability.

There are approximately 160,563 households in Nebraska with a physically disabled family member. Of those households, approximately 34% have 1 of 4 housing problems. Needs for this population may include both financial and supportive services depending on the needs of the individual. Financial support may be needed for those low or very low income persons. Supportive services may be needed for those persons that may be unable to fully care for themselves. This may include modifications to living spaces including the removal of physical barriers.

Persons with Alcohol/Other Drug Addictions-There is a significant unmet need in the state for persons with alcohol and other drug addictions. There are approximately 9,063 individuals in Nebraska with an alcohol or drug addiction. A majority (51.6%) of these persons are between the ages of 18-35. Needs for this population may include both financial and supportive services depending on the needs of the individual. Financial support may be needed for those low or very low income persons. Supportive services may be needed for those persons that may be unable to fully care for themselves and may include supportive housing and other needed services.

Persons with HIV/AIDS- In Nebraska, persons with HIV/AIDS represent a very small portion of the overall population.

Geography has presented challenges in Nebraska's ability to provide HOPWA services. The majority of medical specialists are located in the eastern part of the state. However, funding has been set

aside to assist clients in meeting transportation needs. Sixty (60) percent of HOPWA clients reside in Douglas County (Omaha area). Seventeen (17) percent reside in the Lincoln area with the remaining 23% living in the rural areas of the state. The households that received HOPWA housing assistance in FY 2013, 100% had income at or below 30% of the Area Median Income.

The HOPWA Program had also observed, through conversations with both case managers and HIV/AIDS clients, similar barriers to accessing services whether clients live in urban or rural areas. These barriers hinder the clients' ability to obtain and maintain stable long-term housing; chronically homelessness, severe mental illness, substance abuse or dependence, physical disabilities/co-morbidities, limited or no access to insurance coverage, intellectual disabilities, low to no income, poor job history, criminal history, limited educational background, limited social support, and undocumented or displaced individuals which can create language barriers.

The HIV/AIDS population located in rural areas identified additional barriers to receiving and maintaining long-term stable housing. Program staff noted limited housing options in the rural areas, the affordability of the housing that is available, the distance to obtaining supportive services, and a lack of available or affordable transportation to obtain various supportive services.

Supportive services may be needed for those persons that may be unable to fully care for themselves and may include supportive housing and other needed services.

Public Housing Residents- Persons needing public housing are those who are low or very low income individuals and families. Needs for this population may include both financial and supportive services depending on the needs of the individual. Financial support may include rental assistance. Supportive services may be needed for those persons that may be unable to fully care for themselves.

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

There is a growing need for elderly housing throughout the state, particularly for low income seniors. This includes housing and supportive services for those senior homeowners who are aging in place and for those seniors who are seeking rentals.

In regard to HIV/AIDS special needs population, the majority of Nebraska's HIV/AIDS households are in the low income category which makes tenant-based housing assistance an ideal option to meet the identified housing need. Unfortunately, the funding is very limited. Emergency rent/mortgage assists in maintaining individuals in their homes. The five (5) units per year of eligibility are often difficult for households with little or no income. However, for households renting their homes, the HOPWA program works closely with the Ryan White Part B program and other agencies in coordinating housing assistance. Permanent housing placement is a vital HOPWA service that continues to reach one of the Program's priority populations, the homeless. Without this assistance, it is extremely difficult to link individuals placed into housing and successfully provide the supportive services they need/request.

Nebraska's HOPWA supportive services have changed based on identified needs through oversight of the program i.e. RentWise (tenant education course), intensive case management for high need clients, and outreach to homeless HIV/AIDS clients. However, the various types of HOPWA housing assistance have not.

Program staff and client concerns related to the rural areas of the state include the limited number of livable housing units, the small number of Housing Authority agencies and the travel distance required to obtain services. In addition, there continues to be stigma associated with HIV/AIDS in many rural communities.

There is a continued need for housing and specific supportive services for persons with other special needs. The supportive services are based on the specific needs of the persons served. Some services may include rental assistance; mental health and substance abuse counseling; and other services.

Overall, these needs were determined through consultation efforts with service providers throughout the state and through the work performed by DED and DHHS in administering the CDBG, HOME, ESG, and HOPWA Programs.

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

Nebraska does not have an Eligible Metropolitan Statistical Area at this time.

Discussion:

See above for additional information.

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Introduction:

The CDBG Program is the primary program that assists with non-housing community development needs. The State of Nebraska has not chosen to target particular geographic areas for special assistance under the CDBG Program, but permits all non-entitlement communities (those communities other than Omaha, Lincoln, and Bellevue) to submit applications in funding categories on a competitive basis. Because of this, the State has not authorized or approved any local government revitalization strategies.

The State will distribute development resources in proportion to development needs. In general, DED will approve funding for development projects for public facilities, public improvements, and public services within the Community Development Priority and will provide additional resources within the Economic Development Priority.

Describe the jurisdiction's need for Public Facilities:

The State of Nebraska continues to need public facilities. Through the Department of Economic Development, a portion of CDBG funds will be utilized for public facilities. Within the CDBG Community Development Priority Need, the programs that generally address activities related to public facilities include: Public Works; Comprehensive Revitalization (CR); Comprehensive Investment & Stabilization (CIS); and Downtown Revitalization.

How were these needs determined?

Through an evaluation of a state-wide survey, and through focus groups and discussions with communities, Development Districts, and other members of the public it was determined that public facilities were a need throughout the state.

Describe the jurisdiction's need for Public Improvements:

The State of Nebraska continues to need public improvements. Through the Department of Economic Development, a portion of CDBG funds will be utilized for public improvements. Within the CDBG Community Development Priority Need, the programs that generally address activities related to public facilities include: Public Works; Comprehensive Revitalization (CR); Comprehensive Investment & Stabilization (CIS); and Downtown Revitalization.

How were these needs determined?

Through an evaluation of the state-wide Community Needs Assessment survey, and through focus groups and discussions with communities, Development Districts, and other members of the public, it was determined that public improvements were a need throughout the state.

Describe the jurisdiction's need for Public Services:

The State of Nebraska continues to need public services. Through the Department of Economic Development, a portion of HOME funds may be utilized for public services as they relate to HOME funding housing projects. Through the Department of Health and Human Services, a portion of ESG and HOPWA funds will be utilized to address public service needs related to homeless persons and those with HIV/AIDS. A portion of these resources are used for targeting housing needs, and a portion of these funds are used to address social service needs.

The following provides details on the HOME, ESG, and HOPWA Programs as they relate to public services.

HOME

The majority of HOME resources are utilized for gap financing in the development of Low Income

Housing Tax Credit (LIHTC) rental housing projects in coordination with NIFA. Each project includes a public service element which includes providing needed services to the tenants of these rental developments. Services may include financial literacy training, apartment cleaning assistance, job training, transportation, and other activities.

Some HOME-funded projects are intended for special needs housing including housing for persons with substance abuse, serious mental illness, developmental disabilities, and other special needs. These projects would include unique public services to those individuals requiring higher levels of care and support.

ESG

Within the Nebraska Homeless Assistance Program (NHAP), the Program that works with ESG resources, there are a variety of services that funded which assist the homeless population and those persons at risk of homelessness. These activities include: housing relocation and stabilization services; assessment and case management; risk assessments and safety planning for victims of domestic violence; child care; substance abuse treatment; health and mental health services; and transportation.

HOPWA

While the majority of HOPWA funding goes toward Tenant Based Rental Assistance, and those activities associated with TBRA, a portion also goes towards additional activities that include: standard and intensive case management services with a medical and self-sufficiency component; outreach to HIV+ homeless persons/families and homeless service providers; and emergency rental/mortgage assistance. These public services assist the HOPWA clients with their day to day activities.

The State of Nebraska utilizes ESG and HOPWA funds to address public service needs related to homeless persons and those with HIV/AIDS. A portion of these resources are used for targeting housing needs, and a portion of these funds are used to address social service needs. A portion of HOME funds may be utilized to enhance public services when HOME funds are combined with Low Income Housing Tax Credits (LIHTCs) in order to create low income housing that also contains public services. These projects are generally funded within the CRANE process, a joint effort between DED and NIFA in order to provide additional housing and public service resources for persons in need.

How were these needs determined?

Through an evaluation of the Community Needs Assessment survey, through focus groups and discussions with communities, Development Districts, and other members of the public, and through the past experience and expertise of the DED and DHHS Agency staff, it was determined that public services were a need throughout the state.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The unmet housing needs continue to be significant throughout Nebraska. State housing programs (funded by DED and DHHS) are available to communities throughout the state, but due to limited resources a large unmet housing need exists. Below is an overview of the State's Housing Market:

Needed housing programs include:

- HOME funded rental development;
- HOME purchase, rehabilitation, resale program; including down payment assistance and closing cost assistance;
- Tenant Based Rental Assistance (TBRA) utilizing ESG and HOPWA resources, and evaluating the viability of the use of HOME and NAHTF resources for this program as well;
- ESG Rapid Rehousing and other ESG activities;
- HSATF activities;
- CDBG housing activities related primarily to owner occupied rehabilitation, and when appropriate, the use of CDBG housing program income and other resources for rental rehabilitation and down payment assistance;
- NAHTF activities related to homebuyer, rental, non-profit operating assistance, and other NAHTF-eligible activities; and
- HOPWA activities.

The above mentioned programs are identified within this Consolidated Plan and Annual Action Plan. Other programs that assist and create both affordable and market rate housing are completed by a variety of entities that include: the City of Omaha; Habitat for Humanity; the City of Lincoln; NeighborWorks Northeast; NeighborWorks Lincoln; the City of Bellevue; the Public Housing Agencies (PHAs) throughout the state including the Omaha Housing Authority (OHA); Community Action Agencies (CAPs); the Nebraska Housing Developers Association (NHDA); and a wide range of non-profit organizations and developers throughout the state.

MA-10 Number of Housing Units – 91.310(a)

Introduction

The need for housing (of all income levels) is found in many communities throughout the state. The number and location of units varies by community. The largest populated areas of the state are located within the northeast and southeast part of the state as these areas include Omaha, Lincoln, and Bellevue. Other larger communities (those between 20,000 and 50,000 persons) are also found in various regions of the state, but the majority are within the northeast and central areas.

The majority of units, as the Table below demonstrates, are single family units which make up 73% of the residential properties throughout the state.

The following tables below provide a breakdown of unit types. Further discussion on the makeup of housing stock is found within the information below.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	577,645	73%
1-unit, attached structure	29,952	4%
2-4 units	36,986	5%
5-19 units	68,445	9%
20 or more units	48,938	6%
Mobile Home, boat, RV, van, etc.	31,277	4%
Total	793,243	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	533	0%	6,351	3%
1 bedroom	9,776	2%	65,937	29%
2 bedrooms	96,146	20%	86,963	38%
3 or more bedrooms	382,353	78%	67,644	30%
Total	488,808	100%	226,895	100%

Table 28 – Unit Size by Tenure

Data Source: 2007-2011 ACS

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

With the use of HOME Program funds, rental units will be developed that generally serve families (generally of 4 persons or less), and the elderly (generally 1 person), who have income levels of 60 percent of the Area Median Income (AMI) or less. HOME funds will be combined with Low Income Housing Tax Credits (LIHTCs) through a joint application process with Nebraska’s Housing Finance Authority (also known as NIFA).

HOME funds will also be used for a Purchase, Rehabilitation, Resale (PRR) program which generally assists first time homebuyers (generally a family of two or more persons) whose income level is 80 percent of the AMI or less.

CDBG funds will be used for an Owner Occupied Rehabilitation program which generally assists families (generally 2 persons) or single persons (generally the elderly) with home rehabilitation improvements whose income is at 80 percent of the AMI or less.

Additional State resources that will be utilized include Nebraska Affordable Housing Trust Fund (NAHTF) resources. A portion of these funds will be used as match for the HOME Program for the development of rental units (serving both families and the elderly) through the joint application process with NIFA and will serve persons at 60 percent of the AMI or less.

Additional NAHTF resources will be used for rental programs (serving families at 80% of AMI); homebuyer programs (serving families at 100% of AMI); and owner occupied rehabilitation programs (serving families at 100% of AMI).

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

As affordable housing units throughout the state age ,and deteriorate due to lack of routine maintenance and the aging of major systems (i.e. HVAC, electrical, plumbing, etc.), these units will no longer be viable because they will not meet the required livability standards for units that the State programs serve, and therefore there will be less available affordable units throughout the state.

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

No, annually the number of available affordable housing units is less than the demand for those units in many of the communities throughout the state. More housing units, both affordable and market rate, are needed.

Describe the need for specific types of housing:

Several types of housing units are needed throughout the state in order to serve Nebraska's growing population. These types of housing include:

Rental--Many communities throughout the state that utilize the CDBG and HOME programs discuss with DED the need for additional rental housing. This includes rental housing for persons at 80% of the AMI or less and for persons above 100% of the AMI. Those persons and families at 100% of the AMI make up a significant portion of the workforce in a community. Overall, there are simply not enough rental units in communities that have significant employment opportunities.

Elderly Rental—Many communities, and housing developers, throughout the state discuss with DED the need for additional rental housing units for the elderly (persons 55 years or older) whose incomes are 60 percent of the AMI or less. As the state's elderly population increases, so will the need for additional affordable elderly rental units increase.

Owner Occupied Rehab—many communities, and Development Districts, throughout the state discuss with DED the need for additional owner occupied rehabilitation for persons and families at 80 percent of the AMI. As the state’s housing stock ages additional Owner Occupied Rehabilitation (OOR) is needed in many communities that have significant employment opportunities, and even in those communities that have seen decreases in population over the years. The vast majority of Nebraska communities, if not all, throughout the state have the increased need for OOR Program resources.

Homebuyer—Many communities, non-profit housing organizations, and Development Districts, throughout the state discuss with DED the need for additional homebuyer programs in order to create additional homeownership opportunities in order to serve persons at 80 percent of the AMI for the HOME Program and 100 percent of the AMI for the NAHTF Program. These homebuyer programs may include purchase, rehabilitation, and resale; down payment assistance; new home construction; and closing cost assistance.

Permanent Supportive Housing—many communities throughout the state are in the need of this additional type of housing that serves persons who are homeless or at imminent risk of becoming homeless.

Discussion

See above for additional information.

MA-15 Cost of Housing – 91.310(a)

Introduction

The value of housing throughout Nebraska is relatively low in comparison to the national average. As noted below the Median Home Value is \$123,900, and has increased 43 percent since 2000, but the national average for Median Home Value is \$176,700. See also U.S. Census Quickfacts at: <http://quickfacts.census.gov/qfd/states/31000.html>.

The amount paid per month for rent is also relatively low compared to the national average. Approximately 93 percent of the population pays \$999/month or less and over 47 percent of the population pays less than \$500/month.

However, the cost of buying a home and the amount of rent per month is relative to amount of salary an individual and family earns annually. Nebraska’s per capita income is only \$26,899, with the national average at \$28,155, and the Median Household Income is \$51,046, with the national average at \$53,046. See also U.S. Census Quickfacts at: <http://quickfacts.census.gov/qfd/states/31000.html>.

The cost of housing in Nebraska continues to increase faster than the average household income increases annually.

Below is additional information regarding the cost of housing throughout the state.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	86,900	125,400	44%
Median Contract Rent	412	534	30%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	107,642	47.4%
\$500-999	102,842	45.3%
\$1,000-1,499	11,941	5.3%
\$1,500-1,999	1,997	0.9%
\$2,000 or more	2,473	1.1%
Total	226,895	100.0%

Table 30 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	20,285	No Data
50% HAMFI	80,810	48,650
80% HAMFI	161,180	132,720
100% HAMFI	No Data	191,515
Total	262,275	372,885

Table 31 – Housing Affordability

Data Source: 2007-2011 CHAS NOTE: HAMFI means HUD Area Median Family Income.

Based on the number of households earning 0-30% of the AMI there are not enough rental units in Nebraska affordable to households earning 30% HAMFI with only 20,285 available (as noted above). What this means is that a small percentage of persons at 30% of HAMFI can find units that are affordable. As incomes increase so does the availability of affordable units. However, in some markets, it has been difficult to find housing (both market rate and low income) for both renters and homebuyers. Past experience has shown that this due to lack of sufficient contractors, lack of bank financing, and the overall costs of producing units within some areas of the state.

The following table was generated through the IDIS eCon Planning Suite System which did not provide any data as monthly rents vary throughout the state. Because this Consolidated Plan is for a State grantee no specific information will be available due to significant variations in rents throughout various counties and regions within Nebraska.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 32 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

No, in many communities there is not sufficient housing for households of all income levels (both affordable units for persons at 80% of the AMI or less and market rate units). In many housing markets there are not enough units to serve low income populations due to aging housing stock and sub-standard housing. In addition, in some housing markets where there are significant employment opportunities there are not enough market rate units to serve the growing workforces that are coming to these communities. Communities are finding that they are not able to create enough housing units in order to keep up with the demand for those units.

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

With the increase in rents and home values throughout the state, housing will become less affordable for persons below 80% of the AMI will increase.

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

In some instances rents are comparable, and in other instances market rate rents are more than HOME and fair market rates. Each individual county and community varies throughout the state.

Discussion

As the Table above demonstrates the cost of housing has increased since 2000. Median Home Values have increased by 44% from a median value of \$86,900 to a median value of \$125,400. As the costs to purchase homes increase so does the burden on low income persons when they try and obtain homeownership. Rents have also increase since 2000 by 30% with the average monthly rent going from \$412 per month to \$534 per month. As rents have increased, wages have not increased by the same percentage, and therefore this has created a greater burden on low income renters throughout the state.

MA-20 Condition of Housing – 91.310(a)

Introduction:

Information regarding the condition of housing throughout the state is described below.

Definitions

Definitions that are important regarding the condition of housing include a definition of substandard condition, and what constitutes those units that are substandard but can be rehabilitated and those units that are substandard, but cannot be rehabilitated. In addition, for purposes of the information below HAMFI includes the HUD Area Median Family Income as calculated by HUD.

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

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

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

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

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

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	100,501	21%	85,849	38%
With two selected Conditions	1,960	0%	5,902	3%
With three selected Conditions	76	0%	379	0%
With four selected Conditions	0	0%	42	0%
No selected Conditions	386,271	79%	134,723	59%
Total	488,808	100%	226,895	100%

Table 33 - Condition of Units

Data Source: 2007-2011 ACS

As Table 33 demonstrates, renter-occupied units have a higher frequency of having one or more selected conditions (41 percent) than owner-occupied units (21 percent). Selected conditions include: (1) the lack of complete plumbing facilities, (2) the lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30 percent. It is important to note, however, that the vast majority of units with a selected condition only had one selected condition. A mere 0.3 percent of owner-occupied units and 3 percent of renter-occupied units have two selected conditions. The number of units with three or more selected conditions for both owner-occupied and renter-occupied units is nominal.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	61,507	13%	22,320	10%
1980-1999	99,984	20%	53,481	24%
1950-1979	190,397	39%	92,045	41%
Before 1950	136,920	28%	59,049	26%
Total	488,808	100%	226,895	101%

Table 34 – Year Unit Built

Data Source: 2007-2011 CHAS

From Table 34 one can see that the majority of Nebraska’s housing was constructed after 1950, but prior to 2000. Older units constructed before 1950 represent 28 percent of all owner-occupied units and 26 percent of all renter-occupied units. Units constructed after 1950 but before 2000 represent 59 percent of owner-occupied units and 65 percent of renter-occupied units. Units constructed after 2000 represent 13 percent of owner-occupied units and 10 percent of renter-occupied units.

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	327,317	67%	151,094	67%
Housing Units build before 1980 with children present	31,910	7%	13,445	6%

Table 35 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

The following table was generated in HUD’s IDIS system. No data was available at a statewide level for vacant units.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

As the information above demonstrates, and through consultation with communities and housing organizations throughout the state, there is a significant need for owner occupied rehabilitation and rental rehabilitation in Nebraska. In general, there are not enough resources to rehabilitate all the units, but a system of prioritizing resources is necessary.

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

The information above regarding LBP Hazards identifies a number of units that have the potential to contain LBP and have children present. Additional information and research is needed in order to identify accurate estimates as to the number of LMI persons with LBP hazards throughout the state.

Discussion:

As Table 33 above demonstrates, a significant majority of the housing stock (both owner occupied and renter occupied units) is adequate with none of the “selected conditions” being present in these units. This is a positive sign for the state as it shows much of the housing in the state is habitable, but there continues to be the understanding that greater improvements to the state’s housing stock is needed.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

Below is some brief information regarding Public Housing. The State, through the DED and DHHS programs, does not directly work with Public Housing. Table 37 was generated from the IDIS system within this Optional Section.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers	0	136	7,379	12,187	0	7,494	1,073	0	2,270
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The State of Nebraska CDBG, HOME, ESG, and HOPWA Programs do not work directly with the Public Housing Agencies (PHAs) and are not required to report on the PHAs throughout Nebraska. It is for this reason that no additional information is available for this section.

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

The State of Nebraska CDBG, HOME, ESG, and HOPWA Programs do not work directly with the Public Housing Agencies (PHAs) and are not required to report on the PHAs throughout Nebraska. It is for this reason that no additional information is available for this section.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

The State of Nebraska CDBG, HOME, ESG, and HOPWA Programs do not work directly with the Public Housing Agencies (PHAs) and are not required to report on the PHAs throughout Nebraska. It is for this reason that no additional information is available for this section.

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

The State of Nebraska CDBG, HOME, ESG, and HOPWA Programs do not work directly with the Public Housing Agencies (PHAs) and are not required to report on the PHAs throughout Nebraska. It is for this reason that no additional information is available for this section.

Discussion:

See the information above.

MA-30 Homeless Facilities – 91.310(b)

Introduction

Below is information on the homeless facilities throughout the state.

Table 38 Facilities Targeted to Homeless Persons					
	Emergency Shelter Beds		Transitional Housing	Permanent Supportive Housing Beds	
	Year Round Beds (Current	Voucher/ Seasonal/	Current & New	Current & New	Under Developmen
Households with Adult(s) and Child(ren)	243	0	241	67/44	3
Households with Only Adults	154	9	153	52/11	0
Chronically Homeless Households	0	0	0	23/0	0
Veterans	0	0	0	10/0	0
Unaccompanied Youth	30	0	0	0/0	0
Source: Housing Inventory Count (HIC) 2014 which collects information about all of the beds and units in each Continuum of Care homeless system, categorized by Provider Program Types.					

Table 39 Shelter Capacity	
Number of New Units – Rehabbed	0
Number of New Units – Conversion	0
Total Number of bed - nights available	448,067
Total Number of bed - nights provided	289,574
Capacity Utilization	64.63%
Source: FY 2013 HMIS and DVs which include total number of slots (i.e. beds) that were available in the year and the number of beds that were filled each night in the year.	

Table 39 - Facilities Targeted to Homeless Persons

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

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

- Nebraska Medicaid Program-providing a wide range of services from ambulance services to physician services;
- Division of Children and Family Services-providing a wide range of services that include child welfare and adult protective and safety services to economic support programs such as the Supplemental Nutrition Assistance Program, Aid to Dependent Children, energy assistance, and child care subsidy;
- Division of Development Disabilities-providing a wide range of services for individuals with developmental disabilities;
- Division of Public Health-providing many services that include WIC, health and safety wellness prevention, and even vital records.

Other entities that also provide health services throughout the state include the extension network of community and regional hospitals that are located in many hub communities.

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

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

Several other organizations throughout the state also offer health, mental health, and employment services which complement services targeted to homeless persons and these include:

- Catholic Charities—mental health treatment, therapy/counseling
- CEDARS Youth Services (Lincoln, NE)—services for runaways and homeless youth
- CenterPointe (Lincoln, NE)-addiction and mental health services
- Community Action of Nebraska (Lincoln, NE), Blue Valley Community Action Partnership (Fairbury, NE), Community Action Partnership of Mid-Nebraska (Kearney, NE), Greater Omaha Community Action (Omaha, NE), Panhandle Community Services (Gering, NE), Goldenrod Hills Community Action (Wisner, NE), Central Nebraska Community Services (Loup City, NE), Northwest Community Action Partnership (Chadron, NE), Southeast Nebraska Community Action (Humboldt, NE) -basic needs, child and family development, homelessness prevention services, employment and financial education services, housing services, services for runaways and homeless youth, and community services

- Disability Rights Nebraska (Lincoln, NE)-legal advocacy
- Father Flanagan’s Boys’ Home (Boys Town, NE)-Services for runaways and homeless youth
- Food Pantries (Statewide)-basic needs
- Friendship Home (Lincoln, NE)-domestic violence victim services
- Heartland Family Services (Omaha, NE)-basic needs, hardship assistance, case management
- Houses of Hope (Butler, Fillmore, Gage, Jefferson, Johnson, Lancaster, Nemaha, Otoe, Pawnee, Polk, Richardson, Saline, Saunders, Seward, Thayer, and York counties)-addiction and mental health services
- Legal Aid of Nebraska-legal advocacy
- Nebraska AIDS Project-basic needs for persons with HIV/AIDS, case management
- Nebraska Appleseed Center for Law in the Public Interest (Lincoln, NE)-legal advocacy
- Nebraska Area Agencies on Aging-elderly services
- Nebraska Coalition to End Sexual and Domestic Violence-domestic violence emergency shelter services, education, transportation, medical advocacy
- Nebraska Department of Labor (Lincoln, NE)-job training and counseling
- Nebraska Veterans Service Office (Lincoln, NE and Alliance, NE)-services for veterans and their families
- Nebraska Homeless Assistance Program (Lincoln, NE)- basic needs
- Nebraska Volunteer Lawyers Project-legal advocacy
- Nebraska Workforce Development Career Center (Lincoln, NE)-employment assistance
- Nutrition Education Project (Lincoln, NE)-basic needs, nutrition education
- Open Door Mission (Omaha, NE)- basic needs, health care services, homeless prevention services
- People’s City Mission (Lincoln, NE)-basic needs, health care services, homeless prevention services
- Salvation Army (Omaha, NE)-basic needs, homeless prevention, family and children services, elderly services
- Siena/Francis House and Homeless Shelter (Omaha, NE)- basic needs, child and family development, homelessness prevention services, domestic violence victim services, housing services, and community services
- Stephen Center (Omaha, NE)-homeless prevention, basic needs
- The Good Samaritan Society-services for the elderly and frail elderly
- Together (Omaha, NE)-homeless prevention, basic needs
- Women Infants and Children (WIC) -health services

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

Care and other Continuums throughout Nebraska to determine what available services and resources might be available to all categories of homeless persons (i.e. chronically homeless, families, veterans, unaccompanied youth, etc.). Resources available are dependent on where individuals live in Nebraska. More services are available within the larger metro areas such as Lincoln and Omaha and less are available within other areas.

The above mentioned information lists a number of service providers that have routinely helped in providing homeless assistance and services.

In regard to homeless persons served through the HOPWA Program (as noted with MA-35), the Omaha Nebraska AIDS Project (NAP) staff are members of the Metro Area Continuum of Care for the Homeless (MACCH) and collaborate with other housing programs including Heartland Family Services (homeless/near homeless housing services), Together Inc., and Veteran services. All of these programs provide short-term and long-term rent to people who are homeless or at risk of becoming homeless.

In addition, through collaboration and the development of the Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska, efforts are being made to stream line and compile the available homeless services in any given community.

Within SP-40 and the description of Nebraska's institutional delivery structure, there are many entities identified that assist homeless persons. Some of these include:

- Community Action Partnership (CAP) has offices throughout Nebraska and is divided up into 9 Community Action Agencies that assist low income families in attaining economic stability and community engagement. See also <http://www.canhelp.org/>
 - Nebraska Department of Economic Development-providing affordable housing throughout Nebraska that can include the development of permanent supportive housing and shelters.
 - Nebraska DHHS-multiple services as noted above.
 - Economic Development Districts-assisting homeless service providers in developing projects for the homeless population.
 - Nebraska Housing Developers Association-serving as an advocate for affordable housing for persons, include the homeless or those at risk of homelessness.
 - Council of State Community Development Agencies-serving as an advocate for State programs, including programs that further the activities of ESG and HOPWA.
 - Non-profit homeless service providers-providing homeless services throughout the state.
 - Nebraska Commission on Housing and Homelessness-providing collaboration with DED and DHHS and other homeless service providers to support programs for the homeless.
 - Metro Area Continuum of Care for the Homeless-providing homeless services for persons in the Omaha metro area.
-
- Other Continuums of Care- providing homeless services for persons in Nebraska.

- Omaha Housing Authority-providing housing to persons who may have been homeless.
- Other Housing Authorities-providing housing to persons who may have been homeless.
- Nebraska AIDS Project-assisting persons with HIV/AIDS that includes those who are homeless.

Overall, as MA-30 demonstrates there are a number of services and service providers that are available in Nebraska. There is a continued need for these services, but help is available. Please see also the Service Provider Listing in the Appendix.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

There is a growing need for special needs facilities and services in Nebraska.

With the aging of the Baby Boomers there will be an increased need for senior housing in the coming years. The current amount of senior housing remains inadequate to keep up with the demand for these units throughout the state and this trend will continue.

The 2010-2014 Consolidated Plan noted that there was a significant need for special needs housing.

As is evident through the utilization of resources within the HOPWA Program, those persons living with HIV/AIDS need continued assistance for housing, utilities, and rental assistance. Additional supportive services are also needed and identified below.

The following table provides default data based on reports submitted by the State for the HOPWA Program. The numbers indicated below on Table 42 are primarily estimates. The HOPWA program normally exceeds the number of persons listed. With annual increases in HOPWA funding, Nebraska’s HOPWA Program hopes to increase the number of Tenant-Based Rental Assistance (TBRA) households.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	12
PH in facilities	0
STRMU	30
ST or TH facilities	0
PH placement	13

Table 40 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who

are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

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

Elderly and Frail Elderly

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

Persons with Disabilities (mental, physical, and developmental)

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

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

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

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

Persons with Alcohol/Other Drug Addictions

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

HOPWA

The Omaha NAP staff include members of the Metro Area Continuum of Care for the Homeless (MACCH) and collaborate with other housing programs including Heartland Family Services (homeless/near homeless housing services), Together Inc., and Veteran services. All of these programs provide short-term and long-term rent to people at risk of becoming homeless as well as for homeless and chronically homeless individuals. The Homeless Review Team (HRT) prioritizes access to local resources for people exiting hospitals and prisons and utilizes a Vulnerability Index to rate client need. Representatives from local agencies who participate in the weekly HRT meetings discuss those ranked most vulnerable in order to put wrap-around services in place.

The rural area of Nebraska is served by the Regional Mental Health and Substance Abuse Services which is located in the DHHS, Division of Behavioral Health. Individuals receiving HOPWA case management have the added advantage in the rural area of Nebraska of having an advocate that assists in accessing a number of agencies and services needed to obtain and maintain a stable, affordable housing unit.

When HOPWA Program staff are made aware of a HIV/AIDS individual exiting a facility or institution, discharge planning is completed to ensure the individual has housing and supportive services at time of discharge. This process can begin up to 90 days prior to discharge.

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

Within Nebraska, a variety of homeless services are provided which assist persons with special needs. In addition, a number of service providers are located in many parts of the state, but in some areas services are not as readily available.

There are HUD Section 811 programs (supportive housing for persons with disabilities) in numerous locations in Nebraska. This is the primary housing funding source to finance affordable housing for persons with mental and physical disabilities. Other state and federal funding sources exist to assist with funding housing for those with serious mental illness. These include Section 42 Low-Income

Housing Tax Credit program and the Nebraska Affordable Housing Trust Fund. These programs are available to those returning from mental and physical health institutions so they can receive appropriate supportive housing.

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

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

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

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

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

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

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

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

Not applicable, as this Consolidated Plan is for a State and not for an entitlement or consortia grantee.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The Consolidated Plan regulations require the state to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that effect the return on residential investment. Further, the state is required to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing.

Tax Policy affecting land and other property

The State has taken steps to alleviate some of the property tax burden that is a barrier to affordable housing. The majority of property taxes are levied by school districts and in an attempt to reduce some of that burden Nebraska has pushed for the consolidation of schools and in some cases school districts. In addition, the State has devised a State Aid to education formula that subsidizes local school districts, thus reducing local taxes.

In addition, as part of the Tax Reform Act of 1986, the United States Congress created the Low-Income Housing Tax Credit (LIHTC) (IRC Section 42) to promote development of affordable rental housing for low-income individuals and families. To date, it has been the most successful rental housing production program in Nebraska, creating thousands of residences with very affordable rents. The Low-Income Housing Tax Credit, rather than a direct subsidy, encourages investment of private capital in the development of rental housing by providing a credit to offset an investor's federal income tax liability. The amount of credit a developer or investor may claim is directly related to the amount of qualified development costs incurred and the number of low-income units developed that meet the applicable federal requirements for both tenant income and rents. The Nebraska Investment Finance Authority (NIFA) is designated as Nebraska's housing credit allocation agency.

The Nebraska Department of Economic Development collaborates with NIFA by providing HOME or NAHTF resources to create successful projects. Because the current number of LIHTC's are limited in Nebraska in comparison to previous years there are not enough tax credits in order to finance the number of low income housing projects that are needed within the state. For example, in 2011 there were approximately \$5.3 million in tax credits awarded to projects and in 2015 there have only been \$4.3 million. Less credits means less affordable housing projects that can be funded.

In order to obtain more credits, the Tax Reform Act needs to be revised at the national level. A larger number of LIHTCs in Nebraska would reduce one of the negative effects of a public policy that impacts affordable housing in the state.

In 2015 efforts were made within the Nebraska Legislature to revise the method for appraisals made on low income housing tax credit projects. This revised approach, which was signed into law by the Governor in 2015, requires that appraisals by the county assessor utilize a income-approach calculation to determine the actual value of a rent-restricted housing project. See also LB356 from the 2015 Nebraska Unicameral. This improved approach will improve the tax policy in Nebraska for low income affordable housing units and will reduce a current barrier that exists for affordable housing development, which is high tax values on low income generating properties.

Land Use Controls and Zoning Ordinances

In Nebraska, the state government has very limited influence on land use controls. In particular, the state government cannot dictate the content of locally adopted land use regulations, such as local zoning and subdivision regulations; they are a matter of local control. While State law authorizes local governments to adopt comprehensive planning and zoning requirements, it does not dictate the standards to be included in the local regulations. Also, state law does not mandate that counties or municipalities adopt zoning or comprehensive planning. However, many counties and communities have adopted both zoning and planning ordinances in their areas. The authority to adopt local zoning is permissive; whether to adopt zoning and the requirement to be established is up to the local government.

It is the State's view that there should remain a minimum amount of state-imposed laws, regulations, and ordinances in relation to land use controls and zoning ordinances. Because the state has very little control over these local zoning decisions, land use controls, impact fees, etc. changes would be needed at the local level, if it is determined that local land use controls and local zoning is considered a barrier to affordable housing.

Building Codes

The State has adopted the International Building Code and the International Residential Code, both of which impact the way in which housing must be constructed within Nebraska. Local ordinances also impact local building codes within any given community. The types of codes that are enacted at the local level may impact affordable housing and be considered a barrier. Building codes may adversely affect housing production and could increase housing costs. Efforts are needed to ensure

that local building codes do not hamper additional investment for affordable housing throughout the state.

Revised building codes that could help low income tenants would be to ensure properties are energy efficient and thus reducing the overall utility costs of low income tenants. The costs of implementing such an approach would have to be evaluated in order to determine if it would be an appropriate public policy that would be used to increase affordable housing in Nebraska.

Growth Limits

In some areas of communities regulatory barriers have been developed which places limits on the number of market rate, rental, and affordable housing that may be located within a given area. These growth limits may be considered a negative public policy that may impact affordable housing. Because many of these limits are made at the local level, the State does not have controls in place that would limit the local control of growth limits in given areas. It is the State's view that there should remain a minimum amount of state-imposed laws, regulations, and ordinances in to growth limits. However, education and outreach are important tools in showing the public that mixed income developments (both market rate and rent-restricted units) are not harmful to communities. This outreach would assist in reducing any negative impacts that growth limits may have on affordable housing.

Policies Impact Return on Residential Investment

The amount of return on a residential investment is impacted by the amount of rents that can be generated within a rental development or the amount that a property can be sold to a homebuyer after a home is constructed or rehabilitated. In many instances because affordable housing does not generate large monthly rents, the return on residential investment is limited. The same is true for homebuyer units that are sold. Because these are moderately priced properties, when these properties are sold, the amount of return on residential investment is also limited.

The State does not have control on 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.

Other effects of public policy on affordable housing and residential investment

Through meetings and discussions with the public during the development of the Consolidated Plan some additional barriers or constraints to the development of affordable housing were determined that included: 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. 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 continues to evaluate ways in which to attract additional residential contractors, particularly those that are willing to construct moderate priced homes in communities. Some incentives have been proposed which 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.

The State has little control over the costs of materials and labor, and therefore the overall housing construction costs, but can 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. In some instances, the State is able to partner with community colleges and high school students who are interested in the trades in working on the development of residential units. These collaborative efforts have been utilized in some housing projects and are encouraged within project development.

The State also has little control over the value of residential units in certain markets. Market conditions vary from community to community. In some instances, it may be necessary for additional subsidies to be obtained in order to make it feasible for developers and contractors to build in certain markets.

In terms of lack of residential units (both for rental and homebuyers) the State continues to partner with housing developers, non-profit entities, and communities in creating additional housing stock throughout the state.

The State does work to assist in infrastructure improvements and development for residential areas. This is completed through many of the State's initiatives including through the Nebraska Affordable Housing Program (NAHP).

Assistance with code enforcement development and implementation is encouraged and implemented in many communities through State programs that include: Comprehensive Revitalization, Comprehensive Investment & Stabilization, and in many other housing initiatives.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Below is information regarding the non-housing community development assets throughout the state. Additional research and analyses is currently being conducted. Some specific information was not available at the time of this draft, but more information will be made available prior to the completion of the Final Plans.

Economic Development Market Analysis

The following tables contain data relevant to economic development in Nebraska. Discussion and analysis of the data follows these tables.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	11,690	11,812	3	3	0
Arts, Entertainment, Accommodations	45,669	35,887	11	10	-1
Construction	23,922	22,292	6	6	0
Education and Health Care Services	69,405	51,912	17	15	-2
Finance, Insurance, and Real Estate	30,839	20,167	8	6	-2
Information	8,985	5,422	2	2	0
Manufacturing	65,633	66,383	16	19	3
Other Services	14,834	12,587	4	4	0
Professional, Scientific, Management Services	29,165	17,680	7	5	-2
Public Administration	0	0	0	0	0
Retail Trade	63,439	51,876	15	15	0
Transportation and Warehousing	18,030	23,559	4	7	3
Wholesale Trade	27,836	25,020	7	7	0
Total	409,447	344,597	--	--	--

Table 41- Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	593,977
Civilian Employed Population 16 years and over	567,901
Unemployment Rate	4.39
Unemployment Rate for Ages 16-24	14.90
Unemployment Rate for Ages 25-65	2.81

Table 42 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	125,059
Farming, fisheries and forestry occupations	20,697
Service	60,409
Sales and office	135,298
Construction, extraction, maintenance and repair	64,651
Production, transportation and material	42,764

Table 43 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	421,761	80%
30-59 Minutes	87,119	17%
60 or More Minutes	17,839	3%
Total	526,719	100%

Table 44 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	27,187	2,606	12,048
High school graduate (include equivalent)	124,700	5,218	27,292
Some College or Associate's degree	171,178	5,558	26,912
Bachelor's degree or higher	135,573	2,345	15,724

Table 45 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	1,355	4,372	4,541	6,403	13,868
9th to 12th grade, no diploma	12,708	7,762	6,809	11,954	13,671
High school graduate, GED, or alternative	28,419	28,154	31,969	97,186	74,359
Some college, no degree	37,516	32,287	32,455	73,786	34,333
Associate's degree	6,477	17,855	17,582	30,904	5,274
Bachelor's degree	6,182	29,247	30,019	49,903	14,437
Graduate or professional degree	383	9,431	12,176	24,046	8,666

Table 46 - Educational Attainment by Age

Data Source: 2007-2011 ACS

The following table on Education Attainment and Median Earnings was generated through the IDIS eCon Planning Suite System. No information was available at the time of this draft. Additional information will be reviewed, and additional data added (as appropriate) prior to the Final Consolidated Plan.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

Table 47 – Median

Data Source: 2007-2011 ACS

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

Nebraska's major employment sectors are noted above, some of which include education and health care services and manufacturing.

Describe the workforce and infrastructure needs of business in the state.

As is common in many communities throughout Nebraska, a highly trained workforce is needed for many of the current jobs available. The need for job training is significant within some markets. Adequate infrastructure is also needed and some new infrastructure is needed within businesses that are looking to expand their companies.

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

There are currently no new initiatives or proposals anticipated at the time of the development of this draft. As additional information is obtained within this section, additional information will be provided prior to the completion of the Final Consolidated Plan.

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

As workers become more skilled, they have greater opportunities for obtaining gainful employment. The same is true for a highly educated workforce. Education may include on the job training, secondary education, and education within the specialized sectors of the job force.

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

The State of Nebraska, DED currently provides job training and provides support for those businesses that create internship opportunities for students. Both these initiatives support economic development opportunities throughout the state.

Describe any other state efforts to support economic growth.

Several State initiatives have been implemented by DED that help support economic growth. Some of these initiatives include: Industry Clusters; the Business Innovation Act (BIA) which provides funding for entrepreneurship and small business, innovation, research and development, and advancement of technology. With the Economic Development Program, a Site and Building Development Fund has been established in order to provide additional resources for business expansion and job creation. All of these additional initiatives combined create additional economic growth throughout Nebraska.

Discussion

See above for additional information.

MA-50 Needs and Market Analysis Discussion

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

There are many areas of the state that are in the need of affordable housing. However, the greatest need is demonstrated within the largest urban areas. The two largest communities within Nebraska

(Omaha and Lincoln) have the greatest populations and therefore have the largest concentration of persons with multiple housing problems. Concentration, in this context, is defined as a significant number of persons, relative to the total population.

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

Nebraska is a diverse State. The greatest population concentration is in the Southeast which includes the cities of Omaha, Lincoln, and Bellevue (the only 3 CDBG entitlement communities within the state). The term "concentration" is dependent on the context in which it is applied. Concentration, in this context, is defined as a significant number of persons, relative to the total population.

The communities of Omaha and Lincoln have significant minority populations and low income populations within their communities. Other smaller communities throughout the state also have a significant concentration of minority populations. These communities include: Scottsbluff, Gering, Lexington, Schuyler, Columbus, Norfolk, Madison, South Sioux City, and Crete.

In addition, Nebraska also has 4 federally recognized American Indian tribes including the Winnebago Tribe of Nebraska; the Omaha Tribe of Nebraska; the Santee Sioux Tribe of Nebraska; and the Ponca Tribe of Nebraska. The Omaha, the Winnebago, and the Santee Sioux all have federally recognized tribal reservations in Nebraska, and the Ponca, although a recognized Tribe, does not have a demarcated reservation in Nebraska.

Throughout the state there are a significant number of low income families. These families are located within both the urban and rural areas of Nebraska.

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

Some of the larger communities in Nebraska, particularly Omaha and Lincoln, have identified areas and neighborhoods within each community that have significant poverty levels and significant concentrations of poverty. These areas may be located within the core of each community and include higher poverty rates and generally include additional support services.

Are there any community assets in these areas/neighborhoods?

Significant community assets exist in the areas mentioned. These assets may vary depending on each community, but each community evaluates the assets available in order to determine what additional resources and opportunities might be needed. In some instances, some of the poorer neighborhoods and poorer communities have fewer assets and therefore a greater need for additional resources.

Are there other strategic opportunities in any of these areas?

The largest communities in the state, Omaha and Lincoln, have developed strategies to alleviate poverty within their communities. These efforts include: improving affordable housing and creating addition units; and developing additional supportive services to assist those low income and minority populations that may need additional assistance.

Other communities in Nebraska, including those with populations of 20,000 persons or greater have also created strategic plans in order to address efforts to create additional affordable housing and services to those individuals in need.

Overall, because this Consolidated Plan is for a State grantee, each applicant applying for funds will define the characteristics of the market in the respective areas and neighborhoods of the State where their projects may be located.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

During the development of the Consolidated Plan, an evaluation was made of the needs across the State of Nebraska which has resulted in the identification of priorities and objectives for addressing, mitigating, and hopefully overcoming Nebraska's community development, housing, homeless, and other special needs.

The needs within the state are presented within the Needs Assessment Section of the Consolidated Plan.

The State has developed a five-year course of action that brings priority needs, specific objectives, and performance indicators together in a coordinated plan. This course of action will describe how federal and state resources that are reasonably expected to be available will be utilized to address the state's needs to provide decent housing, a suitable living environment, and expand economic opportunities, principally for extremely low to low and moderate income Nebraska residents.

Through a comprehensive consultation and citizen participation process, which included data analysis and market evaluations, five basic priorities have been established related to funding over the next five years in the areas of: Housing; Homeless Services; HOPWA Services; Economic Development; and Community Development.

A summary of the 5 Priority Needs include:

Housing Priority Need: Respond to needs of affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska.

Community Development Priority Need: Strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development.

Economic Development Priority Need: 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.

Homeless Services Priority Need: Ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at imminent risk of becoming homeless by distributing Emergency Solutions Grant (ESG) Program funds and Homeless Shelter Assistance Trust Fund (HSATF) resources.

HOPWA Services Priority Need: 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 Strategic Plan will identify specific objectives to initiate and implement over the next five years, and establish quantitative measurements for overall five year program accomplishments. It is important to recognize that performance indicators may increase or decrease depending on the annual allocation of federal funds awarded to the State through CDBG, HOME, ESG, and HOPWA Programs, and may, to some degree, be affected by the availability of state funds including those from the Nebraska Affordable Housing Trust Fund (NAHTF) and the Homeless Shelter Assistance Trust Fund (HSATF).

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

The State of Nebraska distributes HUD resources on a competitive basis rather than on an entitlement/formulaic basis. CDBG funding is only available within the non-entitlement areas of the state (which do not include Omaha, Lincoln, and Bellevue, but include all other areas of the state). HOME, ESG, and HOPWA resources are made available throughout the state.

In regard to the Homeless Services Priority Need, ESG funds are allocated through a funding formula and the application process is competitive. A two-year funding cycles is utilized; year one involves a competitive application process; year two involves a renewal application process, only open to current award recipients who are in good standing. 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 (See CoC Map Attachment); the HUD annual Continuum of Care NOFA pro rata amounts; and consideration of statewide service continuity.

There are also no geographic priorities under the HOPWA Program. However, there are geographical differences in how services are delivered by program staff. For example, case managers in the rural areas of Nebraska find it more appropriate to meet with the client at their home or at a location where the client is most comfortable due to high stigma associated with HIV/AIDS. Limited housing options in rural areas (affordability/habitability) encourage individuals to work with their local housing authority. However, barriers such as severe mental illness, undocumented/displaced individuals, criminal history, low or no income, etc., can result in individuals being ineligible for Section 8 programs. This is when HOPWA case management becomes a vital service in ensuring individuals are not homeless. The HOPWA Program works closely with the Ryan White Part B and Part C Programs to assist HIV/AIDS clients in obtaining medical services, housing and supportive services that meet the identified needs.

Because there are no geographic priorities for any of the four federal programs, the information generated in IDIS for the Table is blank.

General Allocation Priorities

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

CDBG funding is only available within the non-entitlement areas of the state (this includes all other areas of the state except Omaha, Lincoln, and Bellevue). HOME, ESG, and HOPWA resources are made available throughout the state.

In addition, ESG funds are allocated through a funding formula and the application process is competitive. A two-year funding cycles is utilized; year one involves a competitive application process; year two involves a renewal application process, only open to current award recipients who are in good standing. 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 (See CoC Map Attachment); the Department of Housing and Urban Development’s (HUD) annual Continuum of Care NOFA pro rata amounts; and consideration of statewide service continuity.

In regard to HOPWA, Nebraska does not have an EMSA at this time.

Nebraska Affordable Housing Trust Fund (NAHTF) resources are allocated according to the requirements identified by the Nebraska Legislature. Through State Statute, NAHTF funds are required to be awarded in each of the three U.S. Congressional Legislative Districts. Further details on the allocation priorities for the NAHTF, review the NAHTF Qualified Allocation Plan which is available on the DED website.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

The following table shows priority needs for the State of Nebraska.

The needs identified as “high” that could be addressed with federal funding are identified below.

Table 48 – Priority Needs Summary

1	Priority Need Name	Housing Priority Need
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Middle, Large Families Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions
	Geographic Areas Affected	Statewide
	Associated Goals	Housing Program

	<p>Description</p>	<p>The State's Housing Priority Need includes the need to respond to regional needs for affordable, decent, safe, and appropriate housing as part of balanced economic development in Nebraska. This Priority Need includes 4 Objectives that have been developed in order to meet the Housing Priority and include:</p> <ul style="list-style-type: none"> • Promote additional affordable rental housing and preservation of affordable rental housing in selected markets. • Promote housing preservation by improving the quality of Nebraska's existing affordable housing. • Promote additional households into homeownership by expanding affordable homeownership opportunities. • Enhance statewide understanding of fair housing law through outreach and education. <p>The housing objectives will be accomplished through the use of CDBG, HOME, and NAHTF resources. A portion of CDBG funds will be used for owner occupied rehabilitation activities and will be aimed at serving persons at or below 80% of the Area Median Income. HOME funds will be utilized for rental housing development through projects developed in conjunction with LIHTCs and acquisition, rehabilitation, and resale activities, also known as Purchase, Rehab, Resale (PRR), for those persons at or below 80% developed in through Community Housing Development Organization (CHDO) projects. Additional objectives will also be accomplished through the utilization of NAHTF resources in which rental; homebuyer; owner occupied rehabilitation; non-profit operating assistance; and education and outreach programs will serve persons throughout the state.</p>
	<p>Basis for Relative Priority</p>	<p>Nebraska has a significant need for affordable housing throughout the state. This need has been identified by communities, developers, non-profit organizations, and other members of the public as a vital resource that helps communities and neighborhoods improve economic opportunities. Adequate housing, is vital to the viability of communities and improves economic development opportunities.</p>

2	Priority Need Name	Community Development Priority Need
	Priority Level	High
	Population	Low Moderate Non-housing Community Development
	Geographic Areas Affected	Statewide
	Associated Goals	Community Development Program
	Description	The Community Development Program is intended to strengthen Nebraska communities through community development programs and services in order to provide a stable platform for economic development. These programs include: Planning; Public Works; Water/Waste Water; Comprehensive Revitalization; Comprehensive Investment & Stabilization; and Downtown Revitalization. CDBG funds will be utilized for projects within the program categories.
	Basis for Relative Priority	Community development activities, particularly street improvements and water and sewer projects, are consistently needed throughout the state in both the urban and rural areas. These activities are generally completed in collaboration with local matching resources and partnerships with other local, state, and federal agencies.
3	Priority Need Name	Economic Development Priority Need
	Priority Level	High
	Population	Low Moderate Other
	Geographic Areas Affected	Statewide
	Associated Goals	Economic Development Program

	Description	<p>The Economic Development Priority need is intended to foster the competitiveness of Nebraska’s business and industrial sector, and as a result, assist in economic development of Nebraska’s communities and people.</p> <p>The objectives that have been created to meet this priority include: promote retention and expansion of existing businesses in Nebraska; investing in public facilities and improvement activities; invest in effective and affordable tourist attractions; and undertake planning activities related to economic development projects.</p> <p>These objectives will be accomplished through CDBG resources that will be utilized for a number of activities that include:</p> <ul style="list-style-type: none"> • Loans to for-profit businesses • Public facilities (infrastructure) projects • Job training grants to for-profit businesses • Speculative building projects or speculative industrial park projects • Short-term interim financing
	Basis for Relative Priority	Economic development and job creation have been identified as vital parts to ensuring the viability of Nebraska communities.
4	Priority Need Name	Homeless Services Priority Need
	Priority Level	High
	Population	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Balance of State (BoS) Continuum of Care (CoC)

	Associated Goals	Nebraska Homeless Assistance Program (NHAP)
	Description	<p>The Homeless Services Priority Need is intended to ensure appropriate emergency shelter and/or transitional housing and services for people who are homeless or at imminent risk of becoming homeless by distributing Emergency Solutions Grant Program funds and Homeless Shelter Assistance Trust Funds.</p> <p>The main objectives that have developed for the Homeless Services Priority include providing appropriate shelter and/or housing to people who are homeless and/or at imminent risk of becoming homeless and providing needed services to people who are homeless and/or at imminent risk of becoming homeless.</p> <p>These objectives will be accomplished through ESG and HSATF resources provided to DHHS.</p> <p>ESG and HSATF resources will be used for a variety of activities that include:</p> <ul style="list-style-type: none"> • Rapid Re-Housing • Homelessness Prevention • HMIS • Emergency Shelter • Street Outreach <p>Nebraska Homeless Assistance Program priorities include strategies that promote self-sufficiency; strategies that address a CoC approach to providing shelter and services; coordination of operations, services and programs; and prevention and rapid re-housing activities.</p>
	Basis for Relative Priority	Addressing homelessness in Nebraska is an important issue in order to improve the lives of persons throughout the state. Ending chronic homelessness is a state and federal priority.
5	Priority Need Name	HOPWA Services Priority Need
	Priority Level	High
	Population	Persons with HIV/AIDS and their Families
	Geographic Areas Affected	Statewide

	Associated Goals	HOPWA Program
	Description	<p>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.</p> <p>The main objective that has been developed for the HOPWA Priority is to provide housing assistance, and related supportive services, to low income persons with HIV/AIDS and their families to enable those persons to achieve stability in housing, reduce the risks of homelessness, and increase access to healthcare.</p> <p>The HOPWA objective will be accomplished through HOPWA resources provided to the Department of Health and Human Services. The HOPWA Program will coordinate with the Nebraska AIDS Project (NAP), who serves as the primary project sponsor and has offices throughout the state in order to serve persons living with HIV/AIDS.</p> <p>HOPWA resources will be used for a variety of activities that include:</p> <ul style="list-style-type: none"> • Tenant Based Rental Assistance (TBRA) • Short-Term Rent and Mortgage Assistance • Supportive Services • Permanent Housing Placement • Housing Information Services • Resource Identification <p>HOPWA services are prioritized to provide outreach to chronically homeless and homeless persons, and their families, living with HIV/AIDS in order to help address those persons housing and supportive/medical needs.</p>
	Basis for Relative Priority	HOPWA formula funding has provided statewide housing resources for persons living with HIV/AIDS in Nebraska for several years and will continue within the coming years.

Narrative (Optional)

In regard to ESG, the State and CoCs are committed to moving to a unified coordinated assessment process which includes prioritization of serving first those most in need. The BoS CoC uses the “Housing First” approach to ending homelessness, which focuses the priority on providing people experiencing homelessness with housing as quickly as possible – and then providing services as needed. Through the HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services.

In addition, the State worked with a wide range of homeless service providers; CoCs; and other interested parties, in coordination with the Nebraska Commission on Housing and Homelessness, in the development of “Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska” (For a complete copy see also the Appendix). The Plan allows for collaboration between federal, state, and local partners who are assisting homeless populations throughout the state and includes: an evaluation of past performance; goal setting for the next 10 years; and developing a comprehensive strategy for ending homelessness, particularly in areas such as chronic homelessness, Veterans homelessness, and homelessness for families, youth, and children. It is the goal of the State to review the Plan, and utilize elements of it, in order for the State to move forward with a coordinated effort to address homelessness.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

The following table shows some of the market characteristics in Nebraska that provide the basis for the proposed funding.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>Nebraska is currently experiencing a shortage of affordable and available rental units for low income and extremely low income households throughout the state.</p> <p>As the 2007-2011 CHAS data indicated, there are only 101,095 units of affordable housing to persons with a HUD Area Median Income of 30% to 50% HAMFI (see also MA-15). This is inadequate to serve the number of low income persons in the need of affordable rental units. With the rising cost of rents (as noted by the 2007-2011 ACS data. see also MA-15) more persons are in the need of TBRA.</p> <p>Some resources, through ESG and HOPWA, are available for TBRA, but there is an increased difficulty of providing affordable housing for lower income renters due to reductions in federal resources.</p>

<p>TBRA for Non-Homeless Special Needs</p>	<p>There is the need for non-homeless special needs rental housing assistance throughout Nebraska. Throughout the state there is a lack of sufficient, affordable, and accessible rental housing for elderly and non-elderly persons with disabilities. There is also a shortage of supportive housing for persons with HIV-AIDS; persons with substance abuse; and other special needs categories.</p> <p>In many instances, renter households that include persons with disabilities are more likely than other households to have very low incomes; pay a larger portion of their monthly incomes for rent; and are more likely to live in substandard housing.</p> <p>As the current HOPWA CAPER and HOPWA Beneficiary Verification Worksheet demonstrated (see also NA-45) there are over 380 persons who are needing, but unable to obtain TBRA for the non-homeless special needs population.</p> <p>Overall, more TBRA for the non-homeless special needs population is needed throughout the state. Currently only a portion of HOPWA resources are used for this activity.</p>
<p>New Unit Production</p>	<p>In many communities throughout Nebraska there is the need for additional housing units. This includes rental units and homebuyer units for many income categories, including those who are low income. In some communities the overall supply of residential units is less than the number of jobs available in current markets. This has resulted in employees and employers having to drive several miles in order to get to their places of employment.</p> <p>Based on the “2015: Profile of Nebraska: Demographics, Economics and Housing Report, Volume I” there were a significant number of persons on waiting lists for rental properties throughout the state. Based on the 2015 Report over 6,000 persons, including over 2,000 persons in Omaha alone, were waiting for vacancies in rental properties. See also p. 56 of the Report at: http://nifa.org/downloads/2015Vol1.pdf. In addition, the Report indicated a significant need of new unit construction in many parts of the state as well. (See also p. 65 of the Report).</p> <p>Overall, as the data indicates, and as is commonly reported to the State by citizens, there is the need for increased residential unit production. HOME and NAHTF resources are used in these efforts, but a large need still remains.</p>

<p>Rehabilitation</p>	<p>Based on the findings of the Community Needs Survey that was conducted during the completion of the Consolidated Plan it was evident from many respondents of the need for additional residential rehabilitation in Nebraska. Of the approximate 240 respondents to the Survey, the top need within the housing category was owner occupied rehabilitation.</p> <p>Other data provides support for this claim. The “2015: Profile of Nebraska: Demographics, Economics and Housing Report, Volume I” indicated that just of the residential units sold between 1999-2014, over 50 percent of the units were built prior to 1970. See also p. 44 of the Report. This is clear indication that the housing stock in Nebraska is aging. Aging housing stock requires rehabilitation and the market indicates this need.</p> <p>CDBG and NAHTF resources are utilized for these efforts, but more resources are needed to effectively rehabilitate a significant amount of housing units in many communities throughout Nebraska.</p>
<p>Acquisition, including preservation</p>	<p>The State utilizes a portion of HOME funds and NAHTF resources for a Purchase, Rehabilitation, Resale (PRR) program which acquires residential properties, rehabilitates those properties, and resells them to low income persons throughout the state. These programs do not keep up with the amount of acquisition and preservation needs that are found in many communities.</p> <p>Based on the above mentioned data, the housing stock in Nebraska is aging and there is a continued need to preserve that existing housing stock. This is evident when the State works with Non-Profit housing organizations who work on acquiring and preserving residential units throughout the state, and is evident by the information that the State receives from its Housing Authority partners. Many Housing Authorities have indicated that their supply of residential units need rehabilitation and preservation.</p> <p>Overall, state and federal resources cannot keep pace with the growing need for acquisition and preservation.</p>

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

The following table describes the anticipated resources to be allocated throughout Nebraska broken down by program type. These anticipated resource projections are made for FY 2015 and the remaining four years of the Consolidated Plan.

Additional information will be identified within the Annual Action Plan as well as supplemental information will be provided regarding the annual allocation of resources. This additional information will be provided within the Appendix.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$9,464,002	\$2,000,000	\$0	\$11,464,002	\$45,856,008	CDBG resources are provided to units of local government for CDBG-eligible activities. 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). State recipients and sub-recipients may also receive administration funds. Additional funds will be provided by DED as match to the CDBG allocation. This amount will fulfill the one to one matching requirement of the CDBG Program.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	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 TBRA	\$3,002,167	\$0	\$0	\$3,002,167	\$12,008,668	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 25% HOME Match requirement for non-administrative funds. No less than 15% of resources will be utilized for CHDO-eligible activities as is required.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$362,364	\$0	\$0	\$362,364	\$1,449,456	HOPWA resources will be used for HOPWA eligible activities. A portion of the annual distribution will be used for administrative expenses to the Nebraska AIDS Project, which is the HOPWA Project Sponsor.
ESG	public - federal	Emergency Shelter, Street Outreach, Homelessness Prevention, Rapid re-housing (rental assistance)	\$948,440	\$0	\$0	\$948,440	\$3,793,760	NHAP funding consists of ESG funds and HSATF resources. HSATF dollars serve as the HUD-required one-to-one match for ESG dollars at the State level. Activities funded with HSATF dollars must also meet federal ESG requirements.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Housing Trust Fund (NAHTF)	public - state	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$9,000,000	\$0	\$0	\$9,000,000	\$36,000,000	Nebraska Affordable Housing Trust Fund (NAHTF) resources will be utilized to further housing programs throughout the state. A portion of the NAHTF resources will be used as match for the HOME Program funds.
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	\$1,900,000	\$0	\$0	\$1,900,000	\$7,600,000	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.

Table 50 - Anticipated Resources

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

CDBG funds will be leveraged with other local resources within the Comprehensive Revitalization, Comprehensive Investment & Stabilization, Public Works, Planning, and Downtown Revitalization categories. DED funds will be utilized in order to meet the matching requirements of the CDBG Program, and this will include matching funds for the CDBG administration allocation which will fulfill the one for one matching requirements of the CDBG Program.

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 25% HOME Match requirement for non-administration funds.

In regard to the ESG Program, the Nebraska Homeless Assistance Program is a grant program that is comprised of the Nebraska Homeless Assistance Trust Fund (HSATF) and the Department of Housing and Urban Development (HUD) Emergency Solutions Grant (ESG). 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 approximately 1.9 million dollars to the Nebraska Homeless Assistance Program. HSATF dollars serve as the HUD-required one-to-one match for ESG dollars, which well exceeds the match requirement. Another resource utilized by some ESG subrecipients who provide transitional housing and/or supportive services is through the CoC Program (SHP). Lastly, a significant amount of local NHAP subrecipients contribute additional resources such as Community Services Block Grant, local foundations, and United Way to the homeless program they operate.

For the HOPWA Program, The majority of leveraging of funds for HOPWA is from the Ryan White Part B program and from Community Action Agencies across the state. It is not known whether the funds from the Community Action Agencies are private, state or local. Assistance that HOPWA clients receive from outside resources are entered into the Provide Case Management software program to support completion of the Consolidated Annual Performance and Evaluation Report (CAPER).

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

Not applicable.

Discussion

See above for more information.

SP-40 Institutional Delivery Structure – 91.315(k)

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

The following is a list of many of the institutional structures through which the State can and will seek to partner, collaborate, and cooperate in order to carry out the intent of the Consolidated Plan. This includes funding through CDBG, HOME, ESG, and HOPWA which will be used within this institutional structure.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Nebraska Department of Economic Development (DED)	Governmental	Conduct meetings to plan and collaborate statewide efforts with the Nebraska Commission on Housing and Homelessness; Coordinate with units of general local government	Statewide
Nebraska Department of Health and Human Services (DHHS)	Governmental	Conduct meetings to plan and collaborate statewide efforts with the Nebraska Commission on Housing and Homelessness; Coordinate with the CoCs, including the BoS CoC.	Statewide
City of Omaha	Governmental	CDBG Entitlement program administration, affordable housing, and other CDBG eligible activities.	Within the Entitlement Jurisdiction

Table 51 - Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Lincoln	Governmental	CDBG Entitlement program administration, affordable housing, and other CDBG eligible activities.	Within the Entitlement Jurisdiction
City of Bellevue	Governmental	CDBG Entitlement program administration, affordable housing, and other CDBG eligible activities.	Within the Entitlement Jurisdiction
Units of General Local Government	Governmental	Completion of CDBG and HOME eligible activities.	Within the Jurisdiction
Non-Profit Housing Providers	Area Non-Profit Agencies	Collaborating with the State in order to develop and implement HUD-funded projects and State-funded projects.	Statewide
For-Profit Housing Developers	Private Entities	Collaborating with the State in order to develop and implement HUD-funded projects and State-funded projects.	Statewide
Financial Institutions	Private Entities	Participate and partner with State and local organizations to provide mortgage products; construction loans; and permanent loans for HUD-funded projects.	Statewide

Table 51 - Institutional Delivery Structure (Continued)

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Nebraska Regional Officials Council (NROC)	Quasi-Governmental	Oversees work of Economic Development Districts throughout the state and collaborates with the State of Nebraska in project development.	Statewide
Economic Development Districts (EDDs)	Quasi-Governmental	Completes project administration for many CDBG, HOME, and NAHTF projects collaborates with the State of Nebraska in project development.	Statewide
Nebraska Housing Developers Association (NHDA)	Non-Profit	Advocacy and outreach for affordable housing programs and collaborates with the State.	Statewide
Council of State Community Development Agencies (COSDA)	Non-Profit	Advocacy and outreach for HUD-funded programs and collaborates with the State.	Nationwide
Non-Profit Homeless Service Providers	Area Non-Profit Agencies	Collaborating with the State in order to provide homeless services.	Statewide
Nebraska Commission on Housing and Homelessness (NCHH)	Non-Profit	Collaborates with the State in order to provide guidance and support for HUD and State-funded programs.	Statewide

Table 51 - Institutional Delivery Structure (Continued)

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Metro Area Continuum of Care for the Homeless	Area Non-Profit Agency	Provides homeless services, support, and guidance for the homeless. Coordinates with State in carrying out projects to assist the homeless.	Omaha
Other Continuums of Care (CoCs)	Area Non-Profit Agency	Provides homeless services, support, and guidance for the homeless. Coordinates with State in carrying out projects to assist the homeless.	Statewide
Omaha Housing Authority (OHA)	Non-Profit	Providing housing and services to low income persons. Collaborates with the State on projects and programs.	Omaha
Other Housing Authorities	Non-Profit	Providing housing and services to low income persons. Collaborates with the State on projects and programs.	Statewide
Nebraska Investment Finance Authority (NIFA)	Quasi-Governmental Agency	Collaborating with the State in order to create affordable housing.	Statewide
U.S. Department of Agriculture-Rural Development (USDA)	Governmental	Collaborates with the State in order to provide guidance, support, and USDA resources for federal and State-funded programs.	Statewide

Table 51 - Institutional Delivery Structure (Continued)

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
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U.S. Department of Housing and Urban Development (HUD)	Governmental	Collaborates with the State in order to provide guidance, support, and HUD resources for federal and State-funded programs.	Statewide
Community Action Agencies	Area Non-Profit Agency	Provides services, support, and guidance for low income persons. Coordinates with State in carrying out projects to assist low income persons.	Statewide
Center for Rural Affairs- Rural Enterprise Assistance Project (REAP)	Non-Profit	Provides services, support, and guidance for persons. Coordinates with State in carrying out projects to assist Nebraskans.	Statewide
Nebraska AIDS Project (NAP)	Non-Profit	Providing education, supportive services, and advocacy for persons with HIV/AIDS. Coordinates with State in carrying out projects.	Statewide
NHAP Subrecipients (Regions 1-5)	Regional CoC members	Providing information and consultation for homeless/at risk of homeless areas.	Statewide

Table 51 - Institutional Delivery Structure (Continued)

Assess of Strengths and Gaps in the Institutional Delivery System

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

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

DED oversees the administration and implementation of CDBG and HOME grants. DHHS oversees the administration and implementation of ESG and HOPWA grants. In addition, DED oversees the Nebraska Affordable Housing Trust Fund (NAHTF) program and DHHS oversees the State's Homeless Shelter Assistance Trust Fund (HSATF) program.

Throughout the year, DED and DHHS meet to ensure consistency in planning, program activities, and program delivery.

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

In delivering ESG resources, DHHS consults with the Balance of State (BOS) Continuum of Care (CoC) to ensure proper alignment of program activities and to ensure consistency with program delivery.

In delivering HOPWA resources, DHHS consults and works directly with the Nebraska AIDS Project (NAP) to ensure proper alignment of program activities and to ensure consistency with program delivery. NAP is the primary service provider for persons with HIV/AIDS and has offices throughout the state.

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

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

There are, however, some existing gaps within the institutional delivery system that include: lack of contractors to complete activities (particularly housing related); insufficient resources to carry out activities based on the needs of communities (for CDBG, HOME, ESG, and HOPWA); and the overall need for greater coordination and education between the service providers and funding institutions.

In order to overcome some of these gaps, the State continues to work with its partners to obtain the necessary technical assistance and education regarding other funding opportunities that might be available and to collaborate on projects in order to provide Nebraskans with needed projects and programs.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	
Employment & Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			
Substance Abuse	X		X

Table 52 - Homeless Prevention Services Summary

To the maximum extent possible, the state expects ESG subrecipients to coordinate and integrate ESG-funded activities with mainstream housing, health, mental health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. As part of Nebraska Homeless Assistance Program (NHAP) Standards, a minimum standard for program coordination has been set and is an expectation from NHAP that subrecipients will follow.

The Nebraska HOPWA Program contracts with Nebraska AIDS Project (NAP) to provide direct services to persons living with HIV/AIDS. NAP is a non-profit organization with 5 offices across the state. NAP serves all 93 counties in the state.

In addition, based on the information within “Opening Doors: 10 Year Plan to Prevent and End Homelessness in the State of Nebraska” (For a complete copy see also the Appendix), to the extent feasible, the State will work with the homeless service providers in moving forward with the goals and proposed accomplishments of the 10 year plan. This includes: evaluating how additional housing stock, particularly Permanent Supportive Housing, can be developed with available resources; evaluating potential coordination among various funders and developers; and evaluating ways in which person who are homeless, or at imminent risk of becoming homeless, might be better served.

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

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

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

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

In regard to the HOPWA Program, the priority populations for the Nebraska’s HOPWA Program are those who are homeless or at risk of homelessness with HIV/AIDS. All individuals are assessed for HIV case management services. A thorough evaluation of housing and supportive service needs is

completed to ensure appropriateness of HOPWA services. Individuals/households placed in HOPWA assisted housing receive case management services as well as a housing/service plan is developed with the client/household. A housing/service plan is developed to ensure ongoing services are in place to maintain stable housing. Once client is established with housing, referrals are made to connect the client to health care providers, mental health providers, and employment services.

In addition, there are several other organizations that provide services targeted to homeless persons and persons with HIV and mainstream services, such as health, mental health, and employment services that are made available to and used by homeless persons. Some of these services, and the organizations associated with them, include:

- The Metro Area Continuum of Care for the Homeless facilitates a homeless street outreach team that works to locate individuals to build trust, and help them engage in services. Applications for programs can be completed with homeless individuals wherever they are living. Access to programs providing housing, health services, food, clothing, transportation, and blankets are provided.
- CenterPointe provides services for persons, some of which are homeless, which include mental health and addiction treatment, rehabilitation, and housing for homeless and low income persons.
- Cirrus House, Inc. provides mental health services for persons living with mental illness who live in the Nebraska Panhandle through opportunities for advocacy, housing, employment, education, and peer support. A number of those persons assisted are homeless or at risk of homelessness.
- People's City Mission provides services for homeless persons in Lincoln with food, clothing, household items, and shelter.
- Open Door Mission provides services for homeless persons in Omaha with food, clothing, household items, and shelter.

DED and DHHS collaborate with these organizations, and others, to ensure that services are provided for those persons who are homeless or at risk of homelessness.

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

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

For ESG, the strength in services is found the collaborations of the Continua of Care. As the capacity of the BoS CoC continues to mature and the reach of partnerships becomes more inclusive, service delivery will become stronger. An example of this can be seen with the work being done through the

CoC and the regional Public Housing (PH) in rural Nebraska to increase the coordination with the Veterans Administration (VA). By increasing access to mainstream housing assistance and targeting VA PH resources, the CoC is able to free up CoC resources to move the system forward to ending chronic homelessness. NHAP's provision of HSATF for SOAR services has strengthened the service delivery system for individuals meeting the definition of 'homeless' or 'at risk of homelessness' who have a mental illness or co-occurring mental illness and substance abuse disorder.

Although the service delivery system is effective, there are gaps in the system that prevent persons from obtaining the necessary services they might need. These services would be for persons that are homeless, or at risk of homelessness, and the special needs populations throughout the state.

One significant gap is the lack of available resources in several communities throughout the state. This is due to limited population size and also due to limited resources as many of the service providers are not able to serve all the persons who are in need.

A second gap in service delivery is due to the range of community types within Nebraska that include large metro areas to small rural regions of the state. Because of these varied community types, the State must ensure that programs meet the needs of the populations living in these different regions. The lack of available service providers is an issue that many communities experience.

In regard to HOPWA, In the rural parts of Nebraska, distance to care, limited service and medical providers, stigma associated with HIV, limited providers with knowledge of HIV, high level of mental health/substance abuse, poverty, isolation, limited habitable housing units, high rural utility costs requires special case management staff to assist HIV/AIDS persons with their needs.

Gaps exist in that services and housing programs require identification or income, which many homeless people do not have. The majority of housing programs require sobriety as part of eligibility. There is much more need for housing assistance than there is assistance available (financially, staffing). Many programs are limited to helping only the chronically homeless.

There are structured and reliable street outreach teams to build rapport and increase engagement. Navigating the various service systems can be very cumbersome and complicated for those experiencing homelessness so the outreach services are vital for linkage to care and support. Transportation can also be a barrier as are waiting lists for some programs/services (Supplemental Security Income/Social Security Disability Insurance {SSI/SSDI}, Outreach, Access and Recovery {SOAR}, public housing, Section 8).

A fourth and final gap in the service delivery system is a result of the need for additional education, outreach, and consultation with collaborating agencies, organizations, and service providers. Although there is coordination, there is the need for more throughout the state. A better understanding of the services that organizations can provide will enhance the service delivery system and ultimately better serve the homeless and special needs populations throughout the

state.

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

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

- DHHS, in coordination with the CoCs will work towards moving the HMIS to a centralized coordinated assessment system with prioritization. Once this process is in place, being able to target those at highest risk will allow for greater penetration in reducing the numbers who are chronically homeless. The state also recognizes the value of using data driven measures to help guide funding, better address the gaps, and ultimately meet and fill the priority needs. It is the goal of this process to enhance services as the CoCs serve a vast area of rural Nebraska which has limited service providers.
- DHHS, through the HOPWA Program and the Metro Area Continuum of Care for the Homeless regularly works collaboratively with key players in the Omaha community to eliminate gaps and build upon strengths. Streamlining and sharing information on existing services with all (clients and providers) is beneficial. Having additional funding, housing assistance, and supportive service programs in general would limit gaps and cyclical behavior patterns exhibited by the HIV/AIDS population being served.
- DED, through coordination with the NCHH, will continue to collaborate with service providers and stakeholders in providing additional education, outreach, and consultation with collaborating agencies, organizations, and service providers. A better understanding of the services that organizations can provide will enhance the service delivery system and ultimately better serve the homeless and special needs populations throughout the state.
- The State, through coordination with the NCHH, will continue to move forward in addressing improvements to the service delivery system through the implementation of the 10 Year Plan to End Homelessness.
- The State will continue to coordinate with other agencies and organizations in order to determine if additional resources are available to assist both homeless and special needs populations.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding (1 year amounts in parentheses)	Goal Outcome Indicator (1 year numbers in parentheses)
1	Housing Program	2015	2019	Affordable Housing	Statewide	Housing Priority Need	CDBG: \$9,500,000 (\$1,900,000) HOME: \$15,010,835 (\$3,002,167) Housing Trust Fund: \$45,000,000 (\$9,000,000)	Rental units constructed: 250 Household Housing Units (50 Units) Homeowner Housing Added: 125 Household Housing Units (25 Units) Homeowner Housing Rehabilitated: 250 Household Housing Units (50 Units)
2	Community Development Program	2015	2019	Non-Housing Community Development	Statewide	Community Development Priority Need	CDBG: \$29,463,270 (\$5,892,654)	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 277,500 Persons Assisted (55,500 Persons) Facade treatment/business building rehabilitation: 175 Businesses Assisted (25 Businesses)
3	Economic Development Program	2015	2019	Non-Housing Community Development	Statewide	Economic Development Priority Need	CDBG: \$18,187,140 (\$3,637,428)	Jobs created/retained: 500 Jobs (100 Jobs) Businesses assisted: 35 Businesses Assisted (7 Businesses)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding (1 year amounts in parentheses)	Goal Outcome Indicator
4	Nebraska Homeless Assistance Program (NHAP)	2015	2019	Homeless	BoS CoC	Homeless Services Priority Need	ESG: \$4,742,200 (\$948,440) HSATF: \$9,500,000 (\$1,900,000)	Tenant-based rental assistance / Rapid Rehousing: 2,260 Households (452 Households) Number of individuals provided emergency or transitional shelter: Homeless Person Overnight Shelter: 36,120 persons (7,224 persons) Number of individuals provided homeless prevention services: Homelessness Prevention: 7,415 persons (1,483 persons)
5	HOPWA Program	2015	2019	Persons with HIV/AIDS	Statewide	HOPWA Services Priority Need	HOPWA: \$1,811,820 (\$362,364)	Tenant-based rental assistance / Rapid Rehousing: 60 Households Assisted (12 households) Other: 225 Other (45 Other)

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Program
	Goal Description	Within the Nebraska Affordable Housing Program resources will be provided that primarily benefit low to moderate income persons through affordable housing activities. These activities are completed through resources from CDBG, HOME, and the NAHTF.
2	Goal Name	Community Development Program
	Goal Description	This Program includes planning; public works; water/waste water; comprehensive revitalization; the Comprehensive Investment & Stabilization Program; 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	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	For Rapid Rehousing-Work toward securing permanent housing options for persons who are homeless. For Homeless Services-Plan on ending homelessness for Nebraskans by providing appropriate shelter and/or housing to people who are homeless and/or at imminent risk of becoming homeless. For Homelessness Prevention-Assure needed services are provided to people who are at imminent risk of becoming homeless.
5	Goal Name	HOPWA Program
	Goal Description	The primary goals of the Program help to provide activities that serve persons with HIV/AIDS throughout Nebraska.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Based on the information above, the number of LMI persons whom the State will provide affordable housing will be significant. Within the Housing Program, approximately 125 LMI persons will be served annually utilizing both CDBG and HOME resources. In addition, a significant number of LMI persons will be served with NAHTF resources. Through the Nebraska Homeless Assistance Program, approximately 1,120 LMI persons will be assisted utilizing ESG and HSATF resources for TBRA and Rapid-Rehousing. In addition, approximately 8,000 LMI persons will utilize emergency, transitional, and overnight shelter funded with ESG and HSATF resources.

HOPWA plans to serve 57 households. In FY 2014, 100% of those served had incomes at or below 30% of the area median. The majority of Nebraska's HIV/AIDS households are in the low income category which makes tenant-based housing assistance an ideal option to meet the identified housing need. Unfortunately, the funding is very limited. However, for households renting their homes, the HOPWA program works closely with the Ryan White Part B program and other agencies in coordinating housing assistance.

SP-46 HOPWA Goals

Description

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

The activities in the "Other" section below include: Short-term Rent/Mortgage Assistance, Permanent Housing Replacement and Supportive Services.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

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

Not applicable.

Activities to Increase Resident Involvements

Not applicable.

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

Not applicable.

Plan to remove the ‘troubled’ designation

Not applicable.

Specific financial assistance to PHAs under any of the Consolidated Plan formula grant programs will be considered as any other eligible applicant competing for those funds, unless the administering State Agency determines that both cause and authority exist to prioritize such funding under the current Consolidated Plan and the Program’s guidelines.

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The Consolidated Plan regulations require the State to describe the State’s strategy to remove or ameliorate negative effects of its policies that serve as barriers to affordable housing as identified within MA-40. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that effect the return on residential investment. The State has adopted a strategy to remove or ameliorate barriers to affordable housing. This strategy includes:

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 what the impacts of the new legislation which revised the method for appraisals made on low income housing tax credit projects that was passed in the state 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.

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.

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 currently collaborates with the Nebraska Department of Energy in ensuring that affordable housing projects meet the property code standards within their developments. The State will continue this collaboration.

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. This outreach would assist in reducing any negative impacts that growth limits may have on affordable housing.

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.

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: 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.

SP-60 Homelessness Strategy – 91.315(d)

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

Within the Continuum of Care (CoC) system, there are providers who specialize in providing outreach and assistance to homeless individual and families within their communities. Activities that have been developed through the collaboration between DHHS and the CoCs include:

- Use data driven outcomes to move funding into the services identified that can best support those who are chronically homeless;
- Continue to provide technical assistance in assisting street outreach programs establish policy and procedure as outreach programs begin work;
- Target Street Outreach to be strongly focused on street based Engagement and Case

Management that should lead to one goal, supporting homeless household in achieving some form of permanent, sustainable housing.

Addressing the emergency and transitional housing needs of homeless persons

DHHS, through the Nebraska Homeless Assistance Program has developed a strategy for addressing these needs that includes the following actions:

- Provide housing necessary for Nebraska's homeless to break the cycle of homelessness through implementation of Nebraska's NHAP;
- Provide decent affordable housing to persons who would otherwise be living on the street or in shelter/transitional housing programs through implementation of the Rapid Re-Housing Program funded through Nebraska's NHAP;
- Provide a coordinated assessment system that will provide a continuum wide system for referring homeless persons and families to the appropriate housing and services;
- Continue to work with providers to increase the accessibility to the Rapid Re-Housing program for households with children throughout the State.

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.

DHHS, through the Nebraska Homeless Assistance Program has developed a strategy for addressing these needs that includes the following actions:

- Continue to support the Housing First model and encourage NHAP subrecipients to prioritize Rapid Re-Housing funds towards ending homelessness;
- Use data driven outcomes to be able to target prevention services effectively;
- Through the use of HMIS data, continue to monitor the length of time household are homeless, and then establish targets for agencies to assist households into permanent housing;
- Through case management and HMIS work to gather data to show barriers individuals and families experience that impacts their success to maintaining housing. Through the CoC and NHAP then search to find and implement solutions for those barriers;
- Continue to support the CoC in their efforts to work with providers in each region to encourage the development of permanent housing options for households with children based on identified needs.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

During HUD Federal Fiscal Year 2013 NHAP allocated approximately 15% of its entire funding for homeless prevention activities. As the HMIS data becomes more valid and reliable NHAP will work to strengthen the use of data to better align the need in Nebraska for homeless prevention activities to the amount of funding available for the activity, and other ESG activities, through the competitive application process. The BoS CoC is actively carrying out discharge protocols from Nebraska Correctional Services, Administrative Regulation 209.01. Regional CoCs train case managers on corrections discharge policy. Currently all subrecipients of State ESG funds are required to follow the HUD eligibility guidelines regarding individuals and families being discharged from institutions to receive homeless services. The CoCs work in collaboration with discharge planners from institutions and other systems of care, to help transition individual into the community from institutions as seamless as possible.

SP-65 Lead based paint Hazards – 91.315(i)

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

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

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

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

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

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

Actions to address and reduce LBP hazards are incorporated within the housing activities that are

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

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

SP-70 Anti-Poverty Strategy – 91.315(j)

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

According to 2009-2013 ACS estimates, approximately 12.8% of the population in Nebraska is below the poverty level. The State of Nebraska recognizes that a single program or emphasis cannot be used to alleviate poverty across the state. The causes of poverty vary widely as do the required actions to reduce the number of poverty-level households. Accordingly, the goals, programs and policies described in this section are intended to work collectively to reduce the number of poverty-level families in the State of Nebraska.

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

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

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

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

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

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

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

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

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

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

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

Also administered by State are two important State-funded resources that include the Nebraska Affordable Housing Trust Fund (NAHTF) and the Homeless Shelter Assistance Trust Fund (HSATF). Both funding sources primarily fund programs that serve low income persons throughout the state.

In addition, the State of Nebraska administers a number of programs designed to reduce the number of individuals and families who live in poverty. Federal funding supports the majority of the programs and State resources supplement those resources. Some of the additional programs that the State provides in order to address the health, well-being, and housing needs of its low income residents includes:

Childcare Assistance—State subsidized childcare allows low-income families to work and have the assistance they need in order to pay for their childcare services. DHHS is the lead agency that administers this program which includes childcare subsidy payments and the collaboration with Department of Education’s Head Start Program.

Food Stamps—The federal Food Stamp Program helps low income households purchase food and raise their nutrition levels.

Head Start—This program provides quality, comprehensive services including education, nutrition, family support, and parent involvement in order to prepare low income children and their families for school.

Lead-Based Paint Hazard Program—Through DHHS, and other organizations throughout the state, public awareness is provided regarding the dangers of lead based paint and a certified risk assessor program is utilized in order to ensure that those contractors working on construction or rehabilitation projects are trained to the proper practices to ensure that lead based paint hazards are minimized for the safety of those persons that may live and work in the buildings that are improved.

Other organizations that the State partners with include working with the several Community Action Agencies (CAAs) throughout the state. These CAAs provide a wide range of anti-poverty programs including employment assistance; vocational rehabilitation; weatherization programs; and assistance with rent and utilities just to name a few. In addition, both DED and DHHS partner with the Nebraska Commission on Housing and Homelessness (NCHH) in order to obtain input on coordinating resources for low income persons including education and outreach, housing, and homelessness.

SP-80 Monitoring – 91.330

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

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

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

CDBG and HOME

DED conducts two basic types of monitoring that is determined by an established “Risk Analysis” process which includes: off-site monitoring (also known as “desktop monitoring”), and on-site monitoring. DED staff regularly review each project to verify that it is proceeding in the manner set forth in the grant agreement and in accordance with applicable laws and regulations. The “Risk Analysis” monitoring plan determines whether a project review is conducted by desktop monitoring or on-site monitoring.

Desktop monitoring is an ongoing process in which the Program Representative, responsible for overseeing the grantee’s project, uses all available information to review the grantee’s performance in carrying out the approved project. This review process enables DED to identify problems requiring immediate attention and to schedule projects for on-site monitoring. Materials used for this review include, but are not limited to: Contract Amendments and/or Extensions to the Grant Agreement; Project Status Reports, Requests for a Draw-down of Funds; DED database review; and other supporting documents.

On-site monitoring is a structured review conducted by the Program Representative at the locations where project activities are being carried out, or where project records are being maintained. One on-site monitoring visit is normally conducted during the course of a project, unless determined otherwise by the “Risk Analysis” process. The “Risk Analysis” components for determining whether a desktop or on-site monitoring review is appropriate includes, but is not limited to: a) the amount of the grant award; b) the length of time since a grantee was monitored; c) the length of time a Program Representative last evaluated a grantee; d) significant outstanding audit issues; e) significant outstanding compliance issues; and f) the types of prior projects monitored.

The monitoring review considers all available evidence of whether a project conformed to an approved Program; whether substantial progress toward program goals had been met; compliance with applicable laws and regulations; and continued capacity of the Grantee and Grant Administrator to carry out the approved Program project.

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

ESG

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

NHAP's general oversight objectives include:

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

The NHAP utilizes the following monitoring process for the ESG program.

Desk monitoring:

Prior to payment, the NHAP staff review every NHAP reimbursement request submitted by all subrecipients each quarter for: 1) math accuracy; 2) form completeness; and 3) apparent compliance with allowable and reasonable cost requirements.

After each billing quarter has been completed, NHAP selects a minimum of two (2) cost items from a minimum of five (5) subrecipients for a more detailed review. Each subrecipient being reviewed must provide supporting documentation that the costs were incurred, paid and allowable.

On-site visits:

Each fiscal year NHAP performs a minimum of four (4) on-site monitoring visits, particularly on subrecipients with known problems. The categories monitored include a review of financial policies and procedures, ESG written policies and procedures, shelter inspections and program participant files.

Performance Measures:

Primary goals the State strives NHAP subrecipients to achieve include reducing the length of homelessness, reducing returns to homelessness and maintaining/increasing income. Through a performance report card with performance metrics that has been established by the BoS CoC, performance on these goals can be measured. Currently a report is issued through HMIS and distributed bi-annually to all CoC and ESG grantees. The state will be moving to adopt and incorporate these performance measurements as an evaluation component of how successful NHAP subrecipients are at reaching and achieving program standards. The performance measurements will also be used to increase housing stability. Part of the performance measures specifically relate to housing stability. 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 homelessness gain stable housing.

HOPWA

The HOPWA Program Manager conducts monthly, desktop monitoring of grantee and project sponsor activities. This monthly review includes a data comparison of case management reports from the Provide Case Management system to verify each client listed on the project sponsor's general ledger is also listed on the Provide reports. This ensures client data is accurate in the Provide system for completion of the annual HOPWA Consolidated Annual Performance and Evaluation Report (CAPER).

HOPWA requests for emergency rent/mortgage and permanent housing placement assistance are reviewed by Nebraska AIDS Project's (NAP's) compliance supervisor, located in the Omaha NAP office, prior to assistance being provided. This process involves the project sponsor's case management staff submitting client documentation of income, expenses, etc. to NAP's compliance supervisor to substantiate the need for client housing assistance.

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

On an annual basis, the HOPWA Program Manager conducts on-site monitoring of client charts at all subgrantee sites (Omaha, Lincoln, Kearney, Norfolk, and Scottsbluff). This review provides quality management assurance that supportive eligibility and service documentation is on file and validates that client program eligibility is being determined appropriately and eligible services are being received. The Provide Database System is monitored regularly to ensure all client/program data fields are accurate and complete.

On an annual basis, the HOPWA Program Manager conducts on-site monitoring of internal controls accomplished out of the subrecipient's field office in Omaha. Monitoring of financial management, personnel, procurement, property management and travel practices are conducted. An annual review of the subrecipient's A-133 OMB audit (and any other requirements of Super Circular) is also performed.