

State: NEBRASKA (QAP 2014)	Nebraska Investment Finance Authority (NIFA)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	≈ NIFA reserves the right not to allocate LIHTC to any development, regardless of ranking/scoring, if it determines that a disproportionate number of LIHTC developments have been developed in a particular census tract within the past three-year period. This right will be exercised only in limited circumstances, such as when LIHTC developments in a particular census tract have a vacancy rate of 7% or more, or if adding current LIHTC Applications to existing LIHTC developments would create a disproportional number of low-income housing units in that particular area (p. 24).
A2. Scoring that discourages racial and economic concentration.	≈ 3 points to developments located in a community with a total population of 5,000 or less (App p. 16). [Not explicit to racial/economic concentration – these could still exist in smaller communities, but if we assume greater geographic diversity = greater mobility options, it supports potential de-concentration.]
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	No.
A4b. Scoring that encourages development in high opportunity areas.	No.
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ¹	≈ (-) 5 points for developments that involve preservation of existing affordable housing with an existing project-based rental assistance agreement (App. p. 14).
A7. Scoring or requirements that preference siting near mass transit.	No.
A8. Focus on and operationalization of a neighborhood revitalization plan.	≈ To target specific economic growth, community development and the provision of affordable housing, NIFA will set-aside up to 33% of Nebraska's annual LIHTC authority to be allocated pursuant to the Collaborative Resources Allocation for Nebraska (the " CRANE Program ") (p. 4) ² . Crane

¹ Evidence of the inverse: preference for development in distressed neighborhoods (by overemphasizing QCT/DDA preference, preference for existing subsidized housing in distressed neighborhoods, preferences for low-income matched financing, etc.) should also be noted.

² [From website] A CRANE project develops out of a community's comprehensive assessment of their housing, economic, and community development needs along with the collaboration of various resources from resource providers. A CRANE project also creates public/private partnerships to implement the CRANE development strategy. NIFA staff work with communities to identify these needs and opportunities for partnerships. The NIFA website lists 14 existing CRANE projects. [From QAP] The focus and primary purpose of CRANE is to target specific long-term, interrelated and coordinated job creation/enhancement, economic growth, joint housing and community development strategies and implementation of plans by

	<p>applications will be scored against other CRANE applications and not against the remainder of competitive applications. [See also notes section and p. 13-14)</p> <p>One of the eligibility categories for CRANE Housing is for developments that are part of a neighborhood redevelopment plan (that has been approved by city or county authorities) for which there is a significant and material public investment that also includes a minimum of 10% market rate units (p. 14).</p> <p>≈ 2 points to developments located in an Economic Development Certified Community as designated by the Nebraska Department of Economic Development or in a CBDG entitlement community (App. p. 16).</p>
B1. Local participation in site selection is limited to statutory minimum. ³	No [no mention of local participation in any capacity].
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	≈ [Threshold Req.] All applications must include an Affirmative Marketing Plan (p. 9)
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentives language access and marketing to non-English speakers.	No.
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	≈ 1 point to developments that have entered into an agreement with the local PHA to consider households from the PHA waiting list as potential tenants (App. p. 16).
D2. Requirements for monitoring Section 8 voucher access <i>in high-opportunity areas</i> .	No.
F1. Incentives for larger family units.	≈ 1 point for developments that include units that target low-income families with children, with at least 25% or more of the units being 3+ bedrooms (App. p. 15).
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (<i>outside high-poverty areas</i>).	<p>≈ Populations with incomes <30% AMI are considered a special needs population by NIFA and is a priority population for CRANE projects (p. 13-4).</p> <p>≈ 2 points to developments that has committed to providing new (PBRA). In order to receive these points, the PBRA must be for at >=25% of the total units and the length of the commitment must be for >=15 years (App. p. 19) [could also pertain to subsidy layering (a negative) in A6, though this is for new subsidies not for preserving existing one.].</p>
REPORTING REQUIREMENTS	

NE communities (p. 13).

³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

H1. Racial/demographic reporting requirements.	No.
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OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: 61 (beyond scoring for threshold criteria). Scoring systems is such that points can only be gained.)

- *QAP gives much emphasis to the CRANE application process and what the CRANE program is for. Aside from CRANE, an explicit mention of opportunity areas or points to encourage developments near certain amenities.*
- *QAP does not explicitly outlines scoring criteria - this is outlined in the application (so has less of an impact on the overall tone of the QAP).*
- *Broad definition of special needs population to include low-income populations.*

Notes:

Set-aside categories are for metro (50%) (South Sioux City, Lincoln, Omaha) and non-metro (50%) (state balance) areas. Non-profit (10%) set-aside is on top of this (p. 3) as well as a 33% set-aside for CRANE projects.

In addition to the 30% basis boost that is allowable to projects outside of QCTs or DDAs under the Housing and Economic Recovery Act of 2008, 15% basis boosts may be requested by all developments (p. 9).

[More on CRANE, p. 13-14] The CRANE Program is a strategic alliance among NIFA and other collaborating resource providers. To participate in the CRANE Program, for-profit or non-profit entities must join together with cities, communities and neighborhoods and collectively demonstrate that through a public process they have assessed the needs of their particular community with respect to economic development, community resource and housing development, and have proposed specific solutions to address those needs (the "Plan"). Proposals submitted under the CRANE Program must demonstrate how current and potential employers and institutions (schools, hospitals, municipal service providers) located in the community will be involved in any proposed solutions. Such proposals shall also demonstrate the development of businesses and creation of jobs and the impact on the development of affordable housing in the area. NIFA will work with other collaborating resource providers to coordinate the various resources available for a community requesting funds for a development pursuant to the CRANE Program and identify those proposals which best demonstrate the need for LIHTC to address the needs identified by a community. Developments eligible to apply for LIHTC through the CRANE PROGRAM include the following:

- Housing for individuals with special needs (such as physical or mental disabilities, substance abuse issues, homeless, or those experiencing severe economic distress), including housing for distressed populations with incomes below 30% of the applicable Area Median Income (AMI). At least 25% of the units must serve individuals with special needs [**G1, O2**].
- Preservation of a development meeting the Secretary of the Interior's Standards for Rehabilitation as interpreted by the National Park Service and involves the use of federal historic rehabilitation tax credits.
- Native American Housing;
- Housing developments in response to judicial findings (or settlement agreements or consent decrees) relating to housing deficiencies, housing discrimination or other housing issues [**O4**]; or
- Housing developments that are part of a neighborhood redevelopment plan (which plan has been approved by appropriate city or county authorities) for which there is a significant and material public investment that also includes a minimum of 10% market rate units [**A8**].
- A housing development located in a community with a current state or presidential disaster declaration that resulted in the loss of housing as determined by NIFA.

OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<p>See O1 (under definition of special needs).</p> <p>≈ 2 points for projects where 20% or more of the units will meet the “visitability” design standards as defined by the NE Assistive Technology Partnership (App. p. 16).</p> <p>1 point to developments that have entered into an agreement with a local supportive service provider that offers services to persons with physical or mental disabilities (App. p. 17).</p>
O2. Scoring that promotes units for special needs populations.	<p>≈ Special needs populations (such as physical or mental disabilities, substance abuse issues, homeless, or those experiencing severe economic distress) are considered a special needs population by NIFA and is a priority population for CRANE projects (p. 13-4).</p> <p>≈ Up to 6 points to developments that provide a percentage of the units for persons with special needs, persons with serious/chronic mental illness, physical disabilities, developmental disabilities, substance abuse issues, and/or homelessness) and there must be an executed agreement with a local service provider (6 points: 75-100% of total units; 4 points: 50-74% of total units; 2 points: 20-49% of total units (App. p. 18).</p>
O3. Scoring to promote home ownership.	<p>≈ 2 points for projects that have an eventual tenant home-ownership plan. Limited to developments proposing a condo regime or that have separate legal descriptions to enable the units to be deeded or conveyed to low-income tenants. To receive points, application must include a copy of the homeownership plan (App. p. 14).</p>
O4. Provisions affirmatively furthering fair housing laws.	<p>≈ One of the eligibility categories for CRANE Housing is for developments in response to judicial findings relating to housing deficiencies, housing discrimination or other housing issues (p. 14).</p> <p>≈ Upon reservation of credits, developments must provide a Fair Housing Certification signed by the development’s architect evidencing that, when constructed in accordance with the plans and specs, the development will be in compliance with the design and construction requirements set forth in the Fair Housing Act and ADA (p. 13, 24, 33).</p>