

**I'm HOME Main Replacement Project**  
**Lincoln Institute of Land Policy**  
Application to U.S. Department of Housing and Urban Development  
Community Planning and Development  
Fiscal Years 2023 and 2024 Preservation and Reinvestment Initiative for Community  
Enhancement (PRICE) Competition MODIFICATION FR-6700-N-99

\*DRAFT\* For Public Comment

***Table of Contents***

Exhibit A - Executive Summary .....	1
Exhibit B - Threshold Requirements .....	2
Exhibit C- Factor (a): NEED .....	2
Exhibit D -- Factor (b): SOUNDNESS OF APPROACH .....	11
Subfactor (b)(i): Project Description, Management, and Impact .....	11
Subfactor (b)(ii): Affordability and Equity .....	23
Subfactor (b)(iii): Environment and Resilience .....	25
Subfactor (b)(iv): Community Engagement.....	27
Exhibit E - Factor (c): Capacity .....	29
Exhibit F Factor (d): Match or Leverage .....	40
Exhibit G Factor (e): LONG TERM EFFECT .....	41
Attachment A: Advancing Racial Equity narrative .....	44
Attachment B: Affirmative Marketing Narrative .....	48
Attachment C: Affirmatively Furthering Fair Housing Narrative .....	52
Attachment D: Eligible Applicants documentation .....	54
Attachment E: Evidence of Partnership Letters, if applicable .....	57

## Exhibit A - Executive Summary

The I'm HOME Main Replacement Project will use the PRICE main grant funds to support sustainable homeownership and wealth creation for 247 low-income and very-low income (LI/VLI) households who own substandard mobile or manufactured homes and face multiple barriers to home replacement. These barriers include the high cost of housing relative to their incomes; lack of clear title to their lots; inadequate or non-existent wells and septic systems; and lack of knowledge about how to purchase and manage a new factory-built home over the long term. The target areas include counties and census tracts with the highest persistent poverty rates in America. Through the I'm HOME Main Replacement Project, the substandard units will be replaced with high-quality, energy efficient, climate-resilient factory-built housing.

The Lincoln Institute of Land Policy is the applicant. The Lincoln Institute is a private operating foundation founded in 1946 to promote the effective use, taxation, and stewardship of land. It has an endowment of \$702 million which supports a \$30 million annual programming budget. The Lincoln Institute has been the steward of the Innovations in Manufactured Homes Network (I'm HOME) since 2022.

The Lincoln Institute has assembled a powerful team of nationally recognized industry leaders to help plan and deliver this Project. The Next Step Network, a national, nonprofit housing intermediary that works to promote the expanded use of factory-built housing to address housing affordability, will serve as the lead contractor for delivering the training, technical assistance, and capacity building of the I'm HOME Main Replacement Project. Additional partners include Abt Global, NeighborWorks America, and three strong nonprofit implementing partners that are all community development financial institutions (CDFIs): Fahe, come dream come build (cdeb), and Neighborhood Partnership Housing Services (NPHS). These organizations have decades of direct experience planning, providing, managing, implementing, and coordinating training and technical assistance in support of community development projects using CDBG, HOME, CDFI, and many other funding sources. Their roles in the I'm HOME Main Replacement Project will be as follows:

- Abt Global will conduct a process and outcome evaluation of the Project and provide training and technical assistance to I'm HOME and Next Step on implementation of a federal HUD grant.
- NeighborWorks America will help disseminate the lessons learned from the Project and the PRICE grant generally by organizing a day-long symposium on Manufactured Housing. This will occur at a NeighborWorks Training Institute or similar forum.
- The three CDFI partners will deliver replacement home assistance to low income and very low income (LI/VLI) owners of substandard pre-1976 mobile homes or pre-1994 manufactured housing. The target areas are a portion of Central Appalachia (Fahe), Southern California farmworker housing ("Polanco Parks") (Neighborhood Partnership Housing Services) and Texas border colonias (Community Development Corporation of Brownsville dba Come dream. Come build).

One hundred percent of borrowers will be helped to purchase a high quality, energy-efficient, climate resilient factory-built home and to complete the necessary site work. This will include pre- and post-purchase homebuyer education and counseling to support sustainable homeownership and create multi-generational wealth building opportunities. Depending on their actual needs, LI/VLI homeowners may also receive assistance with replacing/installing new wells or septic systems and completing title work needed to establish clear title to their lots.

The financial assistance will include a carefully underwritten first mortgage or home-only loan based on the borrowers' ability to pay. A soft-second, zero-interest mortgage or home-only loan will fill the gap between the first mortgage and the total development cost of each unit. The second mortgage or loan will be due on sale or transfer and forgiven after 31 years.

As a result of this grant, 247 LI/VLI households will be helped to purchase high-quality, energy efficient, climate-resilient factory-built housing. Over 50 percent of those assisted will be Black or Brown households. In addition, the process and outcome evaluation conducted by Abt Global will deliver valuable lessons learned regarding how to successfully use factory-built housing to replace substandard mobile and manufactured units in some of the highest poverty areas of the country.

### **Exhibit B - Threshold Requirements**

The Lincoln Institute of Land Policy meets all threshold requirements. The Lincoln Institute of Land Policy

- (1) does not have any unresolved civil rights matters
- (2) will submit the application on time
- (3) is an eligible applicant as a 501(c)3 non-profit entity
- (4) only submitting one application as an eligible applicant

The Lincoln Institute of Land Policy meets all Other Submission Requirements for this application.

### **Exhibit C- Factor (a): NEED**

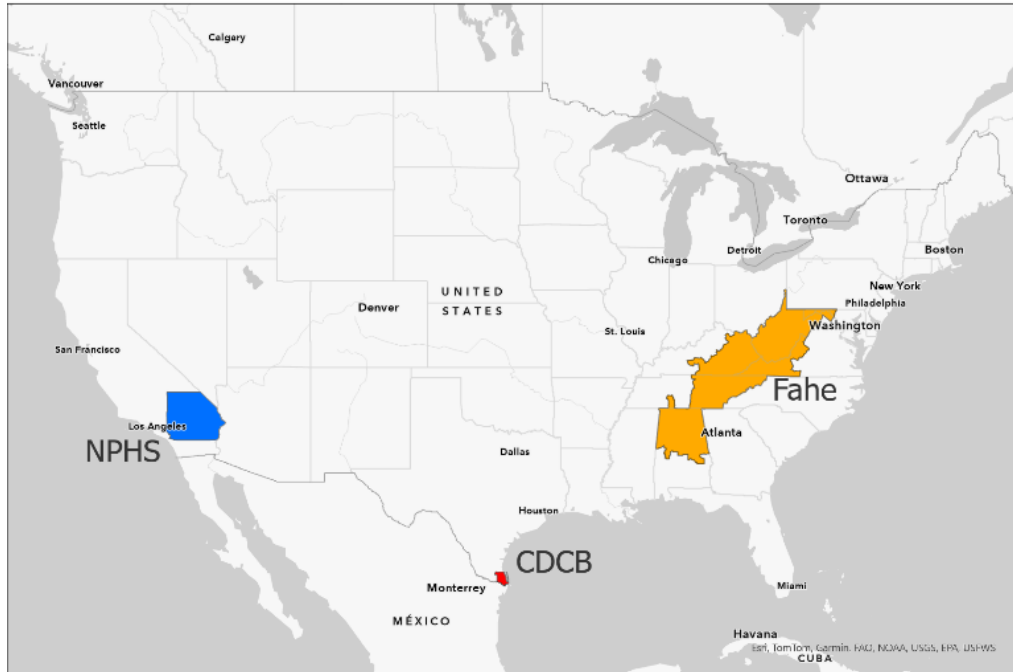
- **Project area and the need for affordable accessible housing**

#### *Summary of Service Area Needs*

The proposed I'm HOME Main Replacement Project will target high/persistent poverty areas of four states; Southern California, the Texas border, and eastern Tennessee and Virginia. The target area is shown in Figure 1. The map also shows secondary areas the project may expand to if needed in order to identify eligible homeowners. All those assisted will be low-income/very-low income (LI/VLI) owners of substandard mobile and manufactured homes.

Figure 1.

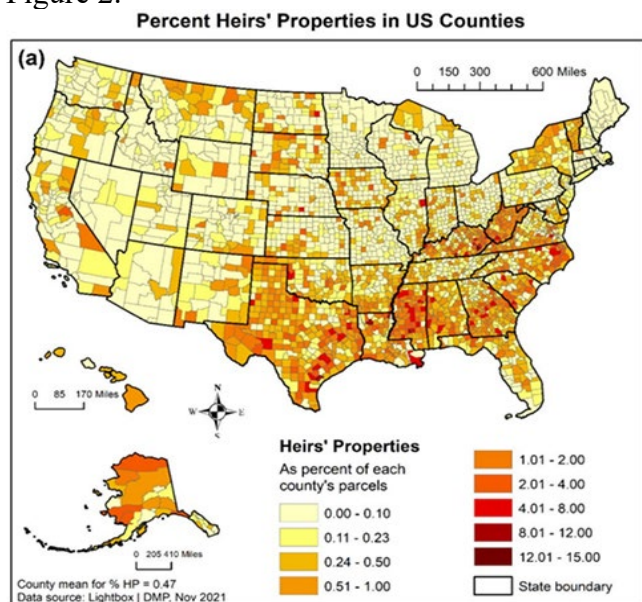
## I'M HOME Manufactured Housing Replacement Project CDFI Service Areas



Common issues unite these diverse areas; these issues are both a result of - and they exacerbate - the poverty of the target homeowners:

1. High prevalence of substandard pre-1976 mobile homes and pre-1994 manufactured housing;
2. Lack of public water/wastewater infrastructure;
3. High energy costs for heating and cooling resulting from poor insulation;
4. Many homeowners no/low savings and no/poor credit histories; and
5. Some units located on “heirs’ property,” defined as land or real estate that is inherited without a clear title or documentation of ownership (see Figure 2).

Figure 2.



Heirs property issues (aka “family land”) prohibit them from obtaining real estate-secured mortgages; instead, they must obtain home-only loans that have higher interest rates and shorter terms, further limiting their affordability.<sup>0F<sup>1</sup></sup> Figure 2 shows the prevalence of this issue; note that it is especially high in the I’m HOME Main Replacement Project target areas. Historically, properties often got transferred without an effective deed or will because Black families could not find a lawyer to represent them, or because they could not afford legal representation.

Together, these factors inhibit wealth building that would improve the lives of the homeowners and their descendants. Due to historic patterns of discrimination these issues disproportionately affect people of color.<sup>1F<sup>2</sup></sup> Following the Civil War and up to 1920 Black families owned 14 percent of all farmland in the U.S.; they own less than 2 percent today.

Taken together, the five issues listed above are difficult and expensive to resolve, but addressing these issues is at the heart of this proposed I’m HOME Main Replacement Project. As we work with LI/VLI borrowers to replace their substandard mobile homes and manufactured housing with new, factory-built units, we will decommission and dispose of the old units, install new wells and septic systems where needed, provide pre- and post-purchase education and counseling to prepare homeowners to purchase and manage their new units, and help resolve “heirs property” issues so they have clear title to the land on which their units are placed. Note that in this proposal we are using the term “factory-built housing” to denote manufactured and modular units that exceed HUD code for manufactured housing by adopting the 1994 and later standards for energy efficiency and climate resilience. **The I’m HOME Main Replacement Project will only help purchase units that exceed HUD code.**

<sup>1</sup>Reynolds, Matt; *How Jim Crow-era Laws Still Tear Families from Their Homes, Race, Racism, and the Law*, March 10, 2021, <https://racism.org/articles/basic-needs/propertyland/9354-how-jim>

<sup>2</sup>Deen, Anna; *What is heirs' property? A huge contributor to Black land loss you might not have heard of*, Fix Solutions Lab (Grist), March, 2021, <https://grist.org/fix/justice/what-is-heirs-property-a-huge-contributor-to-black-land-loss-you-might-not-have-heard-of/>

We propose that the Project will be delivered through one subrecipient and two contract developers operating in high/persistent poverty areas of four states. Fahe will be a subrecipient because it serves as lender to a network of developers. Neighborhood Partnership Housing Services (NPHS) and Community Development Corporation of Brownsville, dba come dream, come build (CDCB), are both contract developers. Hereinafter, these three partners will collectively be referred to as the “CDFI partners.” The proposed approach is contingent upon two waivers that we requested on June 19, 2024:

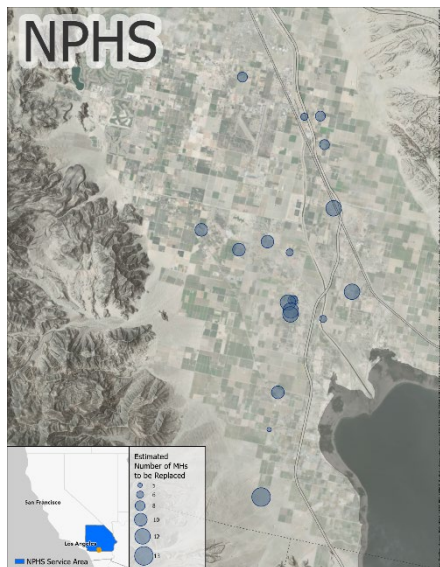
1. Contractor waiver- To streamline the procurement process for all 5 contractors
2. Developer definition waiver – CDBG guidelines call for developers to have site-control, but in a MH situation, the homeowner receiving the replacement unit would maintain site-control.

The waivers include a detailed rationale for these requests. If HUD does not grant the requested waivers then I’m HOME will engage in a competitive procurement process post-award.

The target areas are described in more detail below.

### *Need for Affordable Accessible Housing in Each of the Three Service Areas*

**1. Neighborhood Partnership Housing Services (NPHS)** will deliver the I’m HOME Replacement Project in Riverside County, California as a contract developer. In this county 52% of residents are Hispanic, 7.5% are Black, and 7.8% are Asian.<sup>2</sup> NPHS is working to close the racial wealth gap by increasing homeownership rates for Hispanic and African American Families. By the end of 2023, White homeownership rates were at 73.8%, Hispanic at 49.8% and African American at 45.9%. (FRED, Federal Reserve Bank of St. Louis).



The Eastern Coachella Valley portion of the county houses the largest population of farmworkers living in mobile home parks in California. In 2022 there were almost 14,000 farm workers in Riverside County, and 2,600 in San Bernardino County.<sup>2F3</sup> Many live in so-called “Polanco Parks,” which are up to twelve-unit mobile home parks authorized by the 1992 “Polanco Bill” (California State Law AB 3526), which exempted them from business taxes, local registration fees, and conditional use permits.

Farm labor is low-paid work, so Polanco Parks were often formed by families who pooled their money and purchased land for their extended families, including siblings, cousins, and parents. Strong family networks, entrepreneurial expertise and a tremendous work ethic sustain the Polanco Parks, but these farmworker communities lack financial

capacity to address the Parks’ many needs - water, sewer, and substandard unit quality.<sup>3F4</sup> Many

<sup>3</sup> USDA Census of Agriculture, 2022.

<sup>4</sup> Mendez, Christian, “Housing Choice and Access In the Eastern Coachella Valley: An Ethnographic Study of Housing Among Low-wage Workers,” Master’s Thesis, Urban and Regional Planning Degree, University of California, Los Angeles, 2019.

Polanco Parks residents purchased used mobile homes in the 1990s; they were of poor quality then, and over 30 years later, many are no longer habitable. These homeowners are most at risk from climate change-driven fire and high heat events. They need fire-resilient, energy-efficient housing. In partnership with Pueblo Unidos CDC, which provides outreach to farmworkers, NPHS has identified almost 150 manufactured homes in Polanco Parks needing replacement.

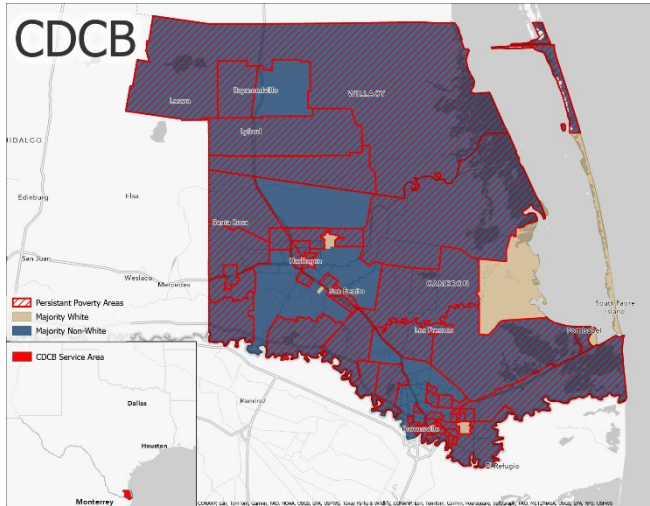
The average hourly wage of a farmworker in California is \$16.44/hour.<sup>5</sup> In Riverside County the cost of a mid-tier (35th to 65th percentile range) home is about twice what it would be in other states. Even entry-level homes are 33% more expensive than in other states. Payments for a bottom-tier home are over \$3,400/month—an 85% increase since Jan. 2020. NPHS' target area is subject to a variety of environmental and climate challenges, including:

- **Extreme Heat:** Especially during the summer months, temperatures can soar above 100°F. The National Weather Service frequently issues heat advisories for these areas during peak summer months, emphasizing the risk to the elderly and those with health conditions.
- **Drought:** California has dealt with recurrent drought conditions for much of the last decade, affecting water availability and heightening wildfire risks.
- **Wildfires:** The U.S. Forest Service reported numerous large-scale fires in recent years, fueled by dry conditions and, often, by Santa Ana winds. The El Dorado and Apple fires in 2020 collectively burned tens of thousands of acres, damaging numerous properties.
- **Air Quality Issues:** The American Lung Association ranks this region poorly for ozone and particulate pollution, which are linked to respiratory and cardiovascular health risks.
- **Flash Flooding:** Despite the arid climate, rainstorms can lead to severe flash flooding. The region's soil cannot quickly absorb sudden rainfall, causing significant flooding and damage.
- **High Winds:** The Santa Ana winds can accelerate wildfires and cause damage to infrastructure. Wind speeds during these events can exceed 60 miles per hour.
- **Earthquakes:** Proximity to major fault lines such as the San Andreas Fault exposes these counties to a high risk of earthquakes, underscoring the need for resilient infrastructure.

**2. Community Development Corporation of Brownsville, dba come dream, come build (CDCB)** will deliver the I'm HOME Replacement Project in the southernmost tip of Texas (Cameron, Willacy, Hidalgo, Starr, and Nueces Counties) along the Mexican border. Home to many colonias, the US Census defines these as Persistent Poverty Counties.

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<sup>5</sup> Zip Recruiter, "Farm Labor Salary in California," May 2024.



Research in the colonias has been limited, so data on the number of units and the characteristics of their occupants are scarce. Colonias are unincorporated neighborhoods, typically in more rural areas, and inhabited largely by Hispanic people. Colonias may have access to public water but lack public wastewater systems and electricity. Many families rely on poorly built septic systems and share electricity by stringing electrical wires between the units, which can be hazardous.

Rates of poverty are significantly higher along the Texas-Mexico border compared to the rest of Texas. According to the US Census, July 1, 2023, persons below poverty in CDCB’s target counties are as follows: Hidalgo (27.4%), Cameron (22.6%), Willacy (29%), Nueces (17.3%), and Starr (32.8%). The economy in the Texas-Mexico border region is based on agriculture and manufacturing, and jobs in these industries are often seasonal and informal. The majority (89%) of residents of the Texas-Mexico border region identify as Hispanic/Latino, compared to 40 percent of all Texans.<sup>5F6</sup>

The colonias are especially vulnerable to flooding and extremes of heat and cold which are more frequent in these counties. Lack of drainage infrastructure within the colonias contributes to a buildup of standing water when floods occur, leading to further deterioration of housing conditions. When flooding occurs, the standing water can be contaminated by inadequate septic systems. This can contaminate drinking wells and put residents at higher risk of contracting water-borne diseases.<sup>6F7</sup> Summer temperatures can exceed 100°F, and while winters are typically mild, there’s been a recent increase in freezing temperatures and ice storms. Extreme temperatures place a heavy burden on the electrical grid, often resulting in outages. Owners of substandard units struggle to heat and cool their homes.

Lacking access to savings or affordable debt, families often build homes in phases using cheap materials, or purchase older, used mobile homes which are widely available in South Texas. In Nueces County, almost 66% of all units were built before 1990; in Willacy County the number is 61.4%. These units typically do not meet code, and pre-1980 units may be contaminated with lead paint and asbestos. When disasters hit, many of these families are not able to qualify for federal assistance due to the prior condition of their homes, leaving them without the financial resources needed to repair damage to their home. This can lead to a buildup of mold, and deterioration of housing conditions, leaving families worse off than before.

<sup>6</sup> Texas Health & Human Services, “Border Report Section 3 – Population and Demographics of the Texas-Mexico Border Region,” 2018, <https://www.dshs.texas.gov/hivstd/reports/border/sec3>

<sup>7</sup> Texas Consolidated Plan, 2019 - 2024, p. 360

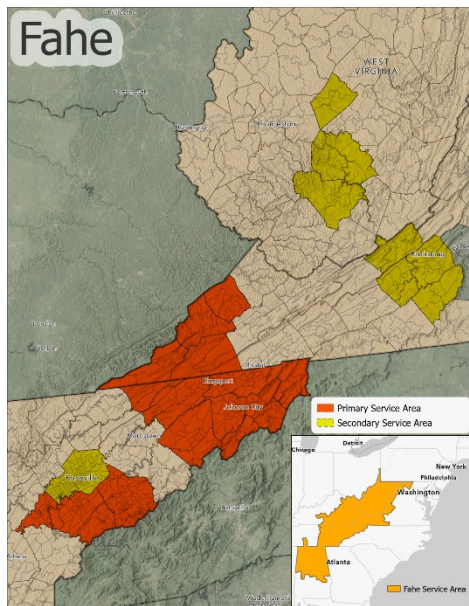


As shown in Figure 2, above, heirs property issues are also prevalent in the colonias on the Texas border, ranging from 1% to 4% of the total parcels. Between 12 and 15 percent of households across the five counties have a member with a disability, making the need for accessible housing especially acute.

*“South Texas is where used mobile homes come to die.” Nick Bennett, Exec. Dir., CDCB*

Affordability is becoming increasingly limited in CDCB’s five-county service area. In Cameron and Starr Counties median housing prices jumped 50% or more between 2020 and 2023, while median household income increased only 15-16%. Home prices in the colonias are generally lower, but they are still climbing.

**3. Fahe** and four of the 50+ nonprofit housing developers in its purpose-driven network will deliver the I’m HOME Replacement Project in high-poverty areas of Central Appalachia as a subrecipient. In Virginia, AppCAA will serve the counties of Lee, Scott, Wise, Dickenson and the City of Norton. In Tennessee, Eastern 8 Community Development will serve the counties of Johnson, Carter, Unicoi, Washington, Greene, Sullivan, Hancock and Hawkins, and Foothills CDC and HomeSource TN will serve Blount, Sevier and Louden counties. Fahe has also identified a secondary service area, including Knox County in Tennessee, Floyd, Giles, Montgomery and Pulaski counties in Virginia, and Clay, Fayette, and Raleigh counties in West Virginia that it may serve, if necessary to identify additional eligible homeowners. Additional members will be brought on using criteria laid out in Factor (b)(1). Subsequent references herein to Fahe’s service area include only the primary service area.



This is a high-poverty region. According to the US Census (July 1, 2023 Population Estimates), the percent of persons living below the federal poverty in each of the target counties is as follows: VIRGINIA: Lee (24.4%), Scott (19.5%), Wise (22.2%), Dickenson (23.4%), and City of Norton (20.3%). TENNESSEE: Johnson (22.3%), Carter (18.3%), Unicoi (15.1%), Washington (14.1%), Greene (17.1%), Sullivan (15.3%), Hancock (27.1%), and Hawkins (14.6%). By contrast, the poverty rate for the United States is 11.5%.

Appalachia has a rich history and culture, a deep sense of community, and extensive natural and human resources. Yet for decades this region has been plagued by persistent poverty caused by exclusionary, extractive, and exploitative economic and policy choices. These areas are also experiencing intensifying weather events, especially heat and flooding, which are particularly destructive in

high/persistent poverty areas.<sup>7F<sup>8</sup></sup> Mobile homes and manufactured homes make up from 13% to 19% of the occupied housing stock in Fahe’s proposed service area. Many were built before

<sup>8</sup> 2024-2028 Fahe Strategic Plan

19808F<sup>9</sup>, and are located in rural areas unserved by public water and wastewater systems. While data are unavailable, the practice of running a straight pipe from homes to the gully or stream out back in lieu of a septic system is well known.<sup>9F</sup><sup>10</sup> In these mountainous, rural communities, groundwater flows near the surface and homeowners frequently rely on private, on-site groundwater wells as their primary source of drinking water. Failing septic systems and straight pipes create chronic water contamination and serious risk of disease.<sup>10F</sup><sup>11</sup> While this practice is illegal, rural towns are not able to monitor this and LI/VLI families cannot afford new wells or septic systems.

An estimated 29% (298,883) of single-family households in Tennessee and 28% (119,726) of households in Virginia have high energy cost burdens.<sup>11F</sup><sup>12</sup> “High energy cost” households are those with energy expenditures in the top 25% of all households. Across the board, owners of pre-1994 factory-built homes are likely to be energy burdened. Seniors are an especially vulnerable subgroup, facing hard choices between food and fuel regularly. Older adults living in mobile homes tend to be women and persons living in more rural areas.<sup>12F</sup><sup>13</sup> Statewide, roughly 9% of homeowners *without a mortgage* in Tennessee and Virginia are cost burdened.<sup>13F</sup><sup>14</sup>

Siting units on “family land” (the term used in Central Appalachia for heirs property) is a common practice. Resolving these title issues is typically beyond the financial capacity of LI/VLI households. There are an estimated 43,512 heirs’ properties in Tennessee that cover almost 517,000 acres, with a value of \$5.5 billion. In Virginia there are an estimated 55,404 heirs’ properties covering over 513,000 acres with a total value of \$8.1 billion.<sup>14F</sup><sup>15</sup>

- **Does project serve any communities that meet Distress Criteria?**

The subrecipient and both contract developers are certified community development financial institutions (CDFIs), and all met their CDFI certification requirements through targeting areas with high poverty rates; parts of these same areas will be the focus of the Project. The CDFIs were chosen because they serve some of the most distressed regions in the country.

CDCB’s target area includes four counties labeled as Persistent Poverty Counties, meaning that they have had a poverty rate of 20% or more for the past 30 years.

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<sup>9</sup> Jones, Mel; Choi Seungbee; Eades, Daniel, *Housing Needs and Trends in Central Appalachia and Appalachian Alabama*, The Virginia Center for Housing Research at Virginia Tech, 2023.

<sup>10</sup> Cantor, Jacob & Krometis, Leigh-Anne & Sarver, Emily & Cook, Nicholas & Badgley, Brian. (2017). *Tracking the downstream impacts of inadequate sanitation in central Appalachia*. *Journal of Water and Health*. 15. wh2017005. 10.2166/wh.2017.005.

<sup>11</sup> [Stoner, Amanda; \*Regulatory Deficiencies in Wastewater Infrastructure in Rural Appalachia\* American University, Washington College of Law, 2018.](#)

<sup>12</sup> Jones, Mel et al, IBID

<sup>13</sup> "Profiles of older adults living in mobile homes" CFPB Office for Older Americans, May 10, 2022.

<sup>14</sup> Jones et al, 2023, Op. Cit.

<sup>15</sup> Thompson, Ryan, and Bailey, Connor; *Identifying Heirs’ Property: Extent and Value Across the South and Appalachia*, a 2023 accepted manuscript of an article to be published by the Journal of Rural Social Sciences, the official peer-reviewed publication of the Southern Rural Sociological Association.

Since 2016, 57% of NPHS' lending in Southern California has been directed to High Poverty Census Tracts. There are 316,657 low-to-moderate income (LMI) households in Riverside County. As of 2023, the poverty rate is 11.8% in Riverside County (Public Policy Institute of California). NPHS plans to target the I'm HOME Main Replacement Project to the Polanco Parks, located in Riverside County, where poverty rates and other distress measures are significantly higher. Fully 98% of NPHS' lending clients fall within its Target Populations either being low-income, Hispanic, or African American.

- **Does your proposal increase resilience in any disaster-prone areas?**

NPHS has seven Community Disaster Resilience Zone (CDRZ) census tracts in Riverside County: 041500, 046700, 042209, 042507, 043292, 043813.

Note that the National Risk Index (NRI) is based on population density and dollar value of at-risk infrastructure which is far greater in urban versus rural tracts. However, FEMA risk assessment tools flag the extremely low levels of Community Resilience, high levels of social vulnerability, and the projected future impacts of climate change increasing the frequency and intensity of weather risk.

There are no CDRZ identified in CDCB's service area in Texas. However, CDCB's five South Texas border counties are all rated "Very High" on the CDC's Social Vulnerability Index, and four of the five are rated "Very Low" for Community Resilience. Four of the five are also rated Relatively Moderate or High for risk of tornados, hurricanes, riverine flooding, ice storms/winter weather, heat waves, and cold waves. Again, owners of pre-1976 mobile homes and pre-1994 manufactured units are most at risk from these events.

The four Fahe members also have no identified CDRZs. Appalachia consists of some of the most disadvantaged regions in the country. For example, in Hancock County, TN, an estimated 2,000 properties (35.2%) may be at-risk of severe flooding. Thus, future environmental threats in these regions are high and will continue to increase. These include severe storms and flooding, landslides and mudslides, winter storms, increased heat/drought/wildfire, and man-made or technological disaster. Rural communities lack the support, resources, personnel and expertise necessary to recover from disasters, or to proactively mitigate their risk.

The I'm HOME Main Replacement Project will replace vulnerable, substandard units with high quality, energy efficient, and climate resilient factory-built homes on permanent foundations.

- **Barriers to MH preservation/revitalization in project area**

This is a replacement program for existing substandard mobile and manufactured units on existing, mostly privately owned lots in rural areas. The target homes will be so deteriorated and energy inefficient that preservation would not be cost efficient, or indeed eligible under CDBG and similar housing assistance programs. The barriers to use of factory-built housing include:

1. **The increasing cost of new housing** due to tight labor markets and surging materials costs. High interest rates also reduce affordability.<sup>15F<sup>16</sup></sup>

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<sup>16</sup> Young, Arica, *Unleashing Manufactured Housing*, Regulation, Spring 2024

2. **Other infrastructure costs**, including site work, new wells and/or septic systems, and legal work to establish clear title increase the per unit total development cost, exceeding what LI/VLI households can pay.
3. **The perception that mobile and manufactured homes** are of poorer quality than site-built, stick-built housing (less an issue for modular units). Persistent unfavorable views are also reflected in public policy addressing titling, valuation, siting/zoning, and finance.<sup>16F</sup><sup>17</sup> Education and advocacy are essential to wider acceptance and use of factory-built housing.<sup>17F</sup><sup>18</sup>
4. **Lack of knowledge and experience, and infrastructure** on the part of nonprofit housing developers on how to work with factory-built housing, including managing shipping logistics from the factory, siting requirements, local permitting and inspection processes, final finishing once units are on-site, and safe decommissioning, and disposal of replaced units. Housing development partners will need training on how to do this work efficiently, safely, and in compliance with applicable regulations.
5. **Homebuyer education and counseling** that specifically addresses the unique needs of factory-built housing is largely missing from curricula, for both replacement home buyers and nonprofit housing staff. New content related to factory-built housing must be added to the training curricula for homebuyer educators and counselors, so they can in turn inform consumers, both pre- and post-purchase.
6. **In the project area, the primary protected class groups include race, ethnicity, and physical disability.** Patterns of racism and discrimination led to segregation, and to racial and ethnically concentrated areas of poverty where there are insufficient resources to assist with replacing substandard housing and infrastructure. In addition, people with disabilities are more likely to live in poverty and to be unable to afford accessibility improvements.

## Exhibit D -- Factor (b): SOUNDNESS OF APPROACH

### *Subfactor (b)(i): Project Description, Management, and Impact*

- **Vision and Goals**

The I'm HOME Main Replacement Project will use PRICE funding to support sustainable homeownership and wealth creation for 247 low-income and very-low income (LI/VLI) households by using affordable financing and subsidy to replace their substandard units with high-quality, Zero Energy Ready, climate-resilient factory-built housing.

PRICE main grant funds will support delivering a scattered-site, multi-state initiative to replace substandard pre-1994 manufactured housing units owned by LI/VLI households who face multiple barriers to replacement. These units will be in high/persistent poverty areas in parts of Central Appalachia (Tennessee and Virginia), in Texas border colonias, and in farmworker housing in Southern California (Polanco Parks). Our three CDFI partners will be responsible for

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<sup>17</sup> Ibid.

<sup>18</sup> Reed, Chadwick, *Harnessing The Potential Of Manufactured Housing to Expand Entry-Level Homeownership*, Joint Center for Housing Studies, Harvard University, April 23, 2024.

affirmative outreach and marketing, homebuyer education and counseling, helping to secure clear title as needed, lending, and managing the process of replacing the homes. Each CDFI partner will re-deploy any program income generated by replacing additional units. If any CDFI partner fails to re-deploy program income, I'm HOME will reassign that income to a different CDFI partner.

Replacement home buyers will receive pre- and post-purchase homebuyer education and counseling including content covering factory-built housing replacement to prepare them for sustainable homeownership. The replacement units will be financed by carefully underwritten loan packages from the three CDFIs. Fahe and CDCB will make real estate secured first and second mortgages, while NPHS will make first and second home-only loans. In all cases the first mortgage/loan will be repayable using the standard of spending no more than 30% of income for the loan repayment and utilities. A PRICE-funded soft-second, forgivable second mortgage/home-only loan will cover the gap between the borrowers' affordability and the total development cost of the replacement homes. In addition to the purchase and transport of the new factory-built home, this cost will include decommissioning and disposal of the substandard unit (including lead or asbestos abatement as needed), site work (including a slab or other permanent foundation), and new wells and septic systems if required (or public utility hook-ups if available). The soft-second mortgage will have an affordability period of 31 years.

### **Innovations:**

The innovation of the I'm HOME Main Replacement Project is that it will combine the expertise of skilled, experienced CDFIs that are trusted partners in the communities they serve with manufactured housing providers dedicated to building Zero Energy Ready, high-performing housing units more rapidly than site-built, stick-built housing and at a lower cost. This expertise and capacity, with PRICE grant funding, will allow the scale-up of a replacement home program focused on the nation's least wealthy and most poorly housed families, in multiple jurisdictions, providing them with sustainable homeownership opportunities that support wealth creation. All the homes will be installed on permanent foundations. Fahe and CDCB will ensure the replacement units have title to the land, allowing real estate secured mortgages. This represents a huge step forward for these homeowners, many of whom live on heirs property. The Polanco Park homes to be replaced by NPHS will have long-term tenure guaranteed because Polanco Park real estate has the following ownership structures:

1. **Sole Owner:** A single individual who has purchased the land where the mobile home park is located. The sole owner rents out space within the park to family and acquaintances who own their own mobile homes. The owner is responsible for managing the property, collecting rent, maintaining infrastructure, and addressing any issues that arise.
2. **Multiple Individual Ownership:** Multiple individuals collectively own the land (typically 7-12 individuals) where the mobile home park is situated. Each owner holds a share of the property and is responsible for paying rent for the space occupied by their mobile home. While the owners jointly own the land, they may still need to contribute funds to maintain the property, pay utilities, and address any shared expenses or repairs.

3. **Trust Ownership:** A trust holds title to the land where the mobile home park is located. The trust is established to ensure that family members inherit the land in accordance with the owner's wishes and to potentially save on costs associated with probate and estate planning. The trust ownership arrangement allows for the orderly transfer of ownership while providing continuity and stability for the park's residents who are typically family members.

Because the Polanco Park homes are not fee simple and these residents cannot afford a mortgage payment, the NPHS transactions will not include a mortgage loan. The NPHS replacements will have a soft, repayable loan to ensure long-term affordability of these units.

An essential element of the Project is to provide training and capacity building to the “boots on the ground” infrastructure required to achieve the project vision and goals. Content specific to the I’m HOME Replacement Main Project will be inserted into “train the trainer” curricula for housing developers as well as for homebuyer education and HUD-certified housing counseling staff. This will be led by technical assistance contractor Next Step, which since 2011 has been wholly dedicated to building relationships between the factory-built housing industry, housing developers, affordable housing advocates, lenders and other key stakeholders to deliver factory-built homes as a viable, sustainable homeownership solution. This training will be delivered at NeighborWorks Training Institutes, place-based training sites that can deliver targeted training close to project communities, and through virtual modules. Next Step will provide direct capacity building to CDFI partners as well.

There is a critical need for more data on how to use factory-built housing to do scattered-site home replacement efficiently and well. Thus, we propose to complete a detailed process and outcome evaluation of the I’m HOME Main Replacement Project. Evaluation data will help us make course corrections during the implementation process (with HUD approval), and to evaluate assisted replacement home buyers’ experience. This evaluation will provide important data for other federal, state and local initiatives looking to replace units in high/persistent poverty areas with factory-built homes. This evaluation will be undertaken by Abt Global under a contract with I’m HOME, paid for by the PRICE grant. In addition, NeighborWorks America will also complete a case study of each of the three target areas.

In Year 5 or 6 of the initiative, NeighborWorks will host a day-long Manufactured Housing Symposium at a NeighborWorks Training Institute or similar gathering, to highlight the lessons learned from the I’m HOME Main Replacement Project.

**National Objectives:**

The proposed activity meets HUD’s Low/Moderate Income (L/MI) National Objective by providing one-to-one replacement of substandard units. One hundred percent of the households assisted by the proposal will be LI/VLI.

**Service Area Selection Criteria/Common Characteristics:**

This project will replace substandard pre-1994 units for LI/VLI homeowners with multiple barriers to unit replacement. The proposed service area is made up exclusively of high-poverty/persistent-poverty regions, colonias, and farmworker communities that are home to some of the nation’s least wealthy households. Many target households live on isolated homesteads in rural communities, in clusters of units (such as in a Southern California Polanco Park), and to a lesser extent in larger neighborhoods and towns. The target areas were selected because of their

high poverty rates, prevalence of substandard mobile and manufactured units, heirs' property (lot titling) challenges and proximity to high-capacity local partners.

To assure the strongest and most experienced front line delivery system, I'm HOME and Next Step used the following criteria to identify potential CDFI partners: They had to be licensed lenders; be CDFIs; have a substantial history of affordable housing lending; have experience as a subrecipient or developer for CDBG and/or HOME; have experience producing, selling, developing or lending for factory-built housing; to be able to provide pre- and post-purchase homebuyer education and counseling; and be able to demonstrate there is a sufficient number of eligible homeowners in their service areas. Service to high/persistent poverty areas was also a factor. Should it become necessary to add other CDFI partners or developers during the grant, I'm HOME would use these same criteria.

### **Landowner Characteristics:**

As noted in Factor 1, the I'm HOME Main Replacement Project will deliver this program in three high-poverty regions of the country. One hundred percent of the households to be assisted under this PRICE grant will live in high/persistent poverty counties and own existing pre-1994 manufactured housing units that are in such deteriorated condition they require replacement. We project that 60% of these units will be sited on fee simple lots also owned by the unit owners. Fahe and CDCB will help replacement home buyers establish clear title to their lots, while NPHS will provide first and second home-only loans due to the prevalence of heirs property in the Polanco Parks. Where the total cost of the replaced property exceeds its appraised value, that portion of the assistance will be structured as a grant to the assisted households.

- **Eligible Activities to Address Need Described in Factor (a)**

- 1. Replacement of Substandard Mobile and Manufactured Units/Related Costs**

- Purchase of new high-quality, Zero Energy Ready, climate-resilient, factory-built units.
- Removing, decommissioning, and safely disposing of old substandard units, including safely managing the disposal of units contaminated with lead paint and asbestos.
- Site-work, connections to public water and/or wastewater systems, drilling of new wells, and installation of new septic systems where needed, or connection to public utilities.
- PRICE grant funds will fill the gap between the total cost of the purchase and installing new factory-built units and the borrowers' ability to pay. Development costs exceeding 100% of the after-replacement fair market value (FMV) as appraised ("appraisal gap"), will be granted to the eligible homeowner.

- 2. Training and Technical Assistance (TA) (provided by Next Step):**

- Providing the soft-second mortgage recapture language and ensuring loan document compliance with applicable state laws.
- TA to CDFIs on clearing title.
- Training and TA on procuring and transporting new factory-built units, permitting requirements, and local systems required to remove, decommission, abate for lead and asbestos where needed, and properly dispose of the replaced units.
- This will include providing an inspection checklist to the CDFIs and training on an oversight methodology to ensure compliance in the field.
- Train the Trainer content and tools tailored to the I'm HOME Main Replacement Project to prepare homebuyer education and counseling staff.

- CDFI partner & developer staff will receive training on Affirmative Marketing, Affirmatively Furthering Fair Housing, and Racial and Environmental Justice, as needed.
- Training to CDFI partner lending staff on project requirements including borrower eligibility and the 31-year recapture requirement of the soft-second loans.
- TA and capacity building to the CDFIs on how to engage local and state governments in covering the cost of removal/disposal of the substandard units, as well as installation of new wells and septic systems.
- Training on how to work with local governments to create efficient systems related to permitting and inspecting the new replacement units.
- Factory-built housing manufacturers and retailers will receive training on the I'm HOME Replacement Project's specifications for new MH units.

**3. Homebuyer Education and Counseling:**

- Pre- and post-purchase education and counseling to LI/VLI borrowers wishing to replace their substandard units. This will be provided in both in-person and virtual formats, in languages spoken by the client or with translation/interpretation as appropriate for those with limited English proficiency (LEP), and with accommodations for those with disabilities, for example adaptations for individuals with hearing or vision impairments.
- Post-purchase education and counseling will cover how to manage the new units, and tips on how to maximize the energy efficiency and resiliency features. Also budgeting and credit, fair housing, loan and mortgage products, delinquency prevention, etc.

**4. Process and Outcome Evaluation - (To be Conducted by Abt Global)**

- Process and outcome evaluation focusing on the extent to which the I'm HOME Main Replacement Project achieves its vision and goals, and the efficacy of the model in three distinct high-poverty areas of the country addressing the needs of different populations: a) Fahe/Central Appalachia- rural scattered site; b) CDCB/Texas border counties- colonias; and c) NPHS/Southern CA- farmworker housing. The evaluation will identify the true costs involved in doing this work successfully, and its value to the assisted families.



## PRICE/Customer Flowchart

Figure 3, below, illustrates how existing homeowners who work with our CDFI partners to replace their substandard mobile or manufactured homes will move through the process.



- **Timeline and Key Tasks**

I'm HOME Main Replacement Project Timeline	Year 1		Year 2		Year 3		Year 4		Year 5		Year 6		Total
	Months												
	1-6	7-12	1-6	7-12	1-6	7-12	1-6	7-12	1-6	7-12	1-6	7-12	
<b>Administrative</b>													
1. Execute PRICE Grant	X	-	-	-	-	-	-	-	-	-	-	-	-
2. Hire new staff	X	-	-	-	-	-	-	-	-	-	-	-	-
3. If requested waivers are denied by HUD, complete RFP process for CDFIs													
4. Execute contracts with CDFI partners	X	-	-	-	-	-	-	-	-	-	-	-	-
5. Develop TA & training packages & checklists for CDFIs and MH retailers	X	-	-	-	-	-	-	-	-	-	-	-	-
6. Develop monitoring and compliance procedures and schedule	X	-	-	-	-	-	-	-	-	-	-	-	-
7. Develop soft-second mortgage instrument/recapture language	X	X	-	-	-	-	-	-	-	-	-	-	-
8. Design evaluation	X	X	-	-	-	-	-	-	-	-	-	-	-
9. Complete initial HUD Environmental Clearance	X	X	-	-	-	-	-	-	-	-	-	-	-
<b>Implementation</b>													
1. Deliver training & TA to CDFI staff, retailers	-	X	X	X	X	X	X	X	X	X	X	X	-
2. Affirmative marketing to replacement home buyers	-	X	X	X	X	X	X	X	X	X	X	X	-
3. Pre-purchase HBE and counseling to borrowers	10	15	46	47	48	48	48	48	48	48	48	48	502
4. Site-based environmental review completed	-	-	23	24	25	25	25	25	25	25	25	25	247

5. Complete legal work to clear titles for assisted buyers	-	-	23	24	25	25	25	25	25	25	25	25	247
6. Originate 1st & 2nd mortgages/loans for buyers	-	-	23	24	25	25	25	25	25	25	25	25	247
7. Install new wells and septic systems, as needed	-	-	4	5	6	6	6	6	6	6	6	6	57
8. Replace substandard MH	-	-	23	24	25	25	25	25	25	25	25	25	247
9. Conduct process & outcome evaluation		X	X	X	X	X	X	X	X	X	X	X	-
<b>Post-Installation Tasks</b>													
1. Post-purchase HBE & counseling	-	-	X	X	X	X	X	X	X	X	X	X	-
2. Quality control inspections of new units	-	-	X	X	X	X	X	X	X	X	X	X	-
3. Compliance auditing	-	-	X	X	X	X	X	X	X	X	X	X	X

- **Budget**

The Lincoln Institute of Land Policy requests \$70,071,071 from the HUD PRICE Main grant program.

Personnel (Direct Labor and Fringe)	\$1,853,807
Travel	\$300,000
Consultants	\$3,645,264
CDFI Partners*	\$64,050,000
Other Direct Costs	\$192,000
Indirect Costs	\$925,661

*\*CDFI partners will contribute \$1.5M in matching funds for a total project cost of \$72,496,732*

Of the total \$72.5M program cost (including costs covered by matching funds), the I'm HOME Replacement Program of Lincoln Institute requests \$5.8M over 6 years to provide program direction, oversight and administration. This figure includes \$3.6M in funding to collaborate with I'm HOME consulting partners Next Step, NeighborWorks America, and Abt Global. These consulting partners will provide training and evaluation advisory services detailed above.

Three CDFI partners of the I'M HOME program, Fahe, CDCB, and NPHS, will administer \$64M or 91% of the request from HUD, to implement the program, while also providing matching funds and leverage (see Exhibit F: Match and Leverage). Two CDFI partners, CDCB and NPHS, will serve as developer contractors to support program implementation in their service areas overseen directly by Lincoln. The third CDFI, Fahe, will serve as a subrecipient and will oversee program implementation in its region.

- **Impacts of Activities If Implemented**

The I'm HOME Main Replacement Project will have the following impacts:

**Financial Security and Wealth Creation**

A projected 247 LI/VLI homeowners will be helped to purchase new, factory-built, high-quality, Zero Energy Ready and climate resilient units that will replace the substandard units they previously owned. Purchasing the new units will be affordable due to a carefully underwritten amortizing first mortgage and a second, interest-free, non-amortizing soft-second mortgage or home-only loan that will fill the gap between the first mortgage and the borrowers' ability to pay.

The legal work required to establish clear title to the lot, and the site work, installing a new well and septic (if needed), or hook-up to public water/wastewater (where available) pose a formidable barrier to home replacement for LI/VLI replacement home buyers. Addressing these items in one affordable loan package will provide a transformative wealth creation opportunity for some of the nation's poorest households in the poorest communities. Pre- and post-purchase education and counseling will prepare borrowers for buying and maintaining their new homes, improving their financial literacy and knowledge of home maintenance.

**Quality of Life Benefits**

New, high quality and energy efficient units will be easier and less expensive to heat and cool. They will have universal design features that provide greater comfort and mobility to people with mobility disabilities, and safe and clean drinking water and wastewater systems. Assisted homeowners will be safer from the risk of floods and fires due to features such as locating outside of flood zones, proper grading, and use of fire-resistant exterior sheathing.

**Environmental Benefits/Disaster Resilience**

Safe removal of the older deteriorated units, many of which will have lead and asbestos hazards, will benefit the unit owners and the surrounding community.

Replacing inadequate septic solutions (such as straight pipes or failed septic systems) will eliminate environmental contamination from raw sewage, improving the health of the assisted households and the community as a whole.

A broader benefit will be establishing and strengthening the delivery system for replacement factory-built homes, which will allow our CDFI partners to affordably, rapidly, and efficiently deliver high quality units to buyers. This will include homebuyer preparation, loan underwriting/financing, site preparation, new wells and septic where needed, transporting new units to the sites, obtaining building permits and completing inspections required. The new capacity will be replicable, leading to expanded use of factory-built homes to address the affordable housing crisis nationwide, potentially reducing costs for nonsubsidized buyers as well.

The logic model, below, summarizes the resources and inputs required to implement the I'm HOME Main Replacement Project, the activities and outputs of the project, and the project impacts.

**Logic Model for I'm HOME Main Replacement Project**

With subsidy, and standardized construction specifications, factory-built housing can be an affordable, resilient, and wealth-creating replacement housing solution for LI/VLI owners of substandard manufactured units, but to do this efficiently the systems required to deliver this need to be strengthened, expanded, and better coordinated. The training and TA will be provided by Next Step, and the units will be delivered through the three CDFI partners.

<b>Inputs</b>	<b>Activities</b>	<b>Outputs</b>	<b>Outcomes</b>	<b>Impacts</b>
Construction standards	Energy efficiency & climate resilient construction/ foundation standards established for factory-built housing	Seven manufacturers prepared to deliver units to specifications	Manufacturers deliver units to specifications	High performance energy-efficient & climate resilient units become the norm for factory-built affordable housing
Curricula developed/ adapted to incorporate factory-built housing.	Curriculum developed, training/TA to manufacturers/retailers working with nonprofit housing providers	Seven manufacturers prepared to partner with nonprofit housing developers	Manufacturers develop knowledge and expertise re: working with nonprofit housing developers	Manufacturers strengthen and expand their markets through relationships with nonprofit housing developers
	Curriculum adapted, training/TA to nonprofit housing developers on ordering, managing local delivery, permitting, & siting, decommissioning/ disposal of factory-built homes	10-15 nonprofit housing development staff receive training	Housing development staff can support replacement home buyers through the process of purchasing factory-built homes.	Nonprofit housing developers strengthen their capacity to support purchase of factory-built housing for all buyers.
	Curriculum adapted, training/TA to HBE & pre-/post-purchase counseling staff to help them support LI/VLI buyers of factory-built replacement homes	30 HBE & counseling providers receive training	HBE & counseling staff can help replacement home buyers understand the value of factory-built homes & subsidies available to purchase them	HBE/Counseling/lending staff strengthen their capacity to support purchase of factory-built housing for all buyers.

	Curriculum adapted, training/TA to nonprofit lenders on subsidy, recapture requirements, and factory-built housing lending	10-15 nonprofit lending staff receive training	Nonprofit lenders help replacement home buyers complete the loan application and closing process	Nonprofit lenders strengthen their capacity to support purchase of factory-built housing for all buyers.
Affirmative Marketing	Marketing materials translated into Spanish, preparations made for working with households with LEP, low literacy, vision, hearing, and mobility disabilities	At least 60% of all potential replacement home buyers are Black or Brown, or have a disability	Members of historically disadvantaged communities learn about replacement housing	At least 50% of replacement home buyers are Black or Brown, or have a disability, helping them to build wealth
Replacement home loans closed/units delivered	About 500 replacement home buyers complete HBE & counseling on debt, subsidy, & factory-built home opportunity	247 LI/VLI households use debt/subsidy to replace their substandard units with new, energy efficient, climate-resilient factory-built homes	New owners have greater opportunity to build wealth; reduced energy costs; improved financial literacy; better living conditions; and better protection from climate-related events	Affordable ownership of energy efficient, climate-resilient factory-built homes helps owners build wealth
Evaluation	Process and outcome evaluation designed	Evaluation conducted	Lessons learned help inform program delivery within six-year grant period, as well as overall performance of model design	Dissemination of lessons learned supports expansion of use of energy efficient, climate-resilient factory-built housing as one solution to meet affordable housing needs

### ***Subfactor (b)(ii): Affordability and Equity***

- **Ensuring the availability of affordable MH housing to LMI households**

#### **Financial security and wealth building**

One hundred percent of the households assisted will be LI/VLI. The financial assistance offered to I'm HOME Main Replacement Project buyers will be carefully underwritten to include an affordable, amortizing first mortgage or home-only loan based on their ability to repay given their current debt and income where possible (see p. 12, under Innovations, for more description). The gap between the repayable first mortgage/home-only loan and the total replacement costs of the home will be covered by a soft second, zero-interest loan that is repayable only on sale or transfer of the property, and which will be forgiven after 31 years.

Central to this is ensuring that all the costs required for successful purchase are identified up front and incorporated into the total per unit replacement cost prior to completing the loan underwriting process. These include costs such as the legal work for confirming or establishing title to the land, where applicable, which is critical to wealth building. Costs will also include site preparation costs, and replacing the well or septic systems, as needed.

Underwriting will consider the increased cost of taxes and insurance that will likely result from replacing an older, substandard unit with a new, high-quality unit that has more value. This approach protects replacement home buyers' financial security by ensuring that the first mortgage is truly affordable, and that significant costs that could prevent the deal from happening, or jeopardize its long-term success, are dealt with at the outset.

#### **Land ownership**

The CDFI partners' staff will investigate whether the replacement home buyers have title to the lots where their units will be sited. Our budget allows for costs associated with establishing clear title to be added to the total project cost, for each unit to be covered by the combination first/second mortgage. In the Polanco Parks (California) where title is held by extended families, NPHS will offer a home-only loan package.

#### **Long term affordability**

The I'm HOME Main Replacement Project will use a soft second mortgage to cover the difference between borrowers' ability to repay and the total cost of replacing the units. The soft second mortgage will be in place for 31 years, due on sale or transfer of the home. The intent is to recapture the subsidy during the affordability period; the loan will not be forgiven until the affordability period ends.

- **Protections in place for residents**

The replacement homebuyers we target will generally own their lots or (with help from the I'm HOME Main Replacement Project) can establish clear title. The exception will be the farmworker housing in the Southern California Polanco Parks, where the land is owned by extended families and members have the right to use it. The Project will not assist tenants on leased land. No displacement will occur; one hundred percent of the replacements will be voluntary.



- **Access to Resources/Financing for Underserved Communities & Persons**

### **Serving people with disabilities**

The I'm HOME Main Replacement Project will increase accessibility opportunities for individuals with disabilities by utilizing universal design principles such as wider doorways and hallways, mobility space in bathrooms, lever handles and faucets. CDFI partners' offices, and the location of marketing events will be accessible to individuals with mobility disabilities by using meeting space at ground level or by having elevators or other assistive technology to allow access for persons using a wheelchair. The accessibility features that can be customized in factory-built replacement housing units will be advertised to inform families with members who have special needs. Marketing and education videos will include subtitles and a Sign Language interpreter. All CDFI partners use TTY lines. Marketing and education materials can be audiotaped for those with visual impairments.

### **Serving low-income individuals, including those from protected classes**

All replacement home buyers assisted will be households at or below 80% of AMI, with a projected 40 percent of these meeting HUD's definition of very low-income. The financing package will be carefully underwritten to ensure the first mortgage is based on each household's ability to pay. A zero-interest, soft-second mortgage will fill the gap between the total development cost and the first mortgage amount. The second mortgage will be repayable only on sale or transfer and forgiven after 31 years. In the Southern California Polanco Parks, home-only loans will be used instead of mortgages due to the land being owned by extended families.

Affirmative marketing and outreach will be directed to owners of substandard units from demographic groups least likely to participate in such programs, including Black and Brown persons, those with limited English proficiency, people with disabilities and families with children. Pre- and post-purchase homebuyer education and counseling which incorporates the I'm HOME Main Replacement Project content will be delivered to assisted households to prepare them to purchase and successfully manage their new, Zero Energy Ready factory-built homes.

Two of the CDFI partners, CDCB and NPHS, serve predominantly Hispanic populations and are each a trusted partner to local community organizations, churches, and other institutions. They will engage historically underserved or underrepresented communities through multilingual outreach (using social and local media platforms) and provide all content in English and Spanish and make material available in other languages as needed. They will utilize social media platforms as well as local media outlets that cater to diverse audiences, including Spanish-language radio stations and newspapers. They will also post information about the project in public spaces such as community centers. Presentations will be delivered to targeted partners who engage with the same populations; these include churches, community centers, educational centers, and fraternal organizations. Fahe's four members serve a predominantly White population, with fewer than 20% of residents Black or African American, and no more than 10.5% Hispanic. Fahe's members operate the Dept. of Energy Weatherization programs which help build their profile as trusted partners to local organizations that can help outreach to communities of color.

### **Section 3**

All CDFI partners have Section 3 Plans updated and approved by their boards annually. CDFI partners will make a good faith effort to hire low-income residents who live in the service area as general or sub-contractors and to encourage them to hire low-income residents too. CDFI partners will recruit through ads in local newspapers and weekly circulars, and through mailings to historically underutilized businesses (HUB). Where YouthBuild or similar programs exist, available jobs and contracts will be posted in those locations. Additional steps will include dividing work requirements, when economically feasible, into smaller tasks or quantities, and establishing delivery schedules that facilitate HUB participation. General contractors' tax returns will be reviewed to verify they, or the subcontractors they hire, are small businesses. CDFI partners will maintain lists of qualified businesses on solicitation lists. The services and assistance of the Office of Minority Business Enterprise of the US Department of Commerce will be used if needed to identify more contractors.

### ***Subfactor (b)(iii): Environment and Resilience***

- **Significant hazards that could impact the project site(s)**

The Environmental Review checklist to be completed on each unit assisted will identify flood hazards and toxic waste, which are greater risks in Central Appalachia and in the colonias in southern Texas. In Southern California, the biggest risk will be from wildfires, although flooding may also be a risk. We will not replace units in toxic or dangerous locations. Replacing failing septic systems and installing new wells where needed, or (if available) connecting units to public water and sewer, will significantly improve the health of replacement home buyers.

- **Address the threat of natural hazards, extreme weather, & disaster events**

We will not replace homes for households whose homes have experienced repetitive loss such as from flooding. For homeowners facing repetitive loss of their homes, CDFI partners will work with buyers and local and state officials to find lots on higher ground or in less risky areas.

The primary way LMI replacement home buyers will be protected is through setting high standards for construction and siting of the factory-built units, including the foundation. All units will have a site-built engineered foundation, constructed of durable materials, such as concrete, masonry, or treated wood. The exterior foundation blocks will consist of a split-faced block, brick veneer, or stucco. No vinyl skirting will be allowed. A crawl space or pit foundation will be required; typically an excavated floor built using poured concrete footers that go into the soil and anchor the home down. The unit will then rest on a perimeter wall supported by piers strategically placed for support points customized to each home. The permanent foundation will be built in accordance with the Permanent Foundations Guide for Manufactured Housing or be structurally designed by a licensed professional engineer.

Homes will be constructed to a HUD Wind Zone III standard, which are the highest wind safety specifications. Construction must conform to the Wildland-Urban Interface (WUI) Code where required<sup>19</sup>. Proper drainage around the home will be required to prevent water from seeping under the home. Disturbed areas of ground must be seeded, sodded, or xeriscaped. In southern California the exterior sheathing will be made of fire-resistant materials.

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<sup>19</sup> The manufactured housing construction standards in 24 CFR 3280.305(c)(1)(ii) for wind zones II and III were established by HUD in a rule published on January 14, 1994 (59 FR 2469) ("January 1994 rule").

[2021 International Wildland-Urban Interface Code \(IWUIC\)](#).

- **Advancing Environmental Justice**

- a) **Reducing or mitigating exposure to environmental and health hazards:**

The I'm HOME Main Replacement Project will install infrastructure such as wells and septic systems, safely dispose of old, substandard units that are contaminated with lead paint and/or asbestos and ensure factory-built units are built with healthy materials. Within all three subregions, low-income households and communities of color are disproportionately impacted by environmental hazards and substandard housing conditions, usually because they cannot afford more desirable areas. For example, in the Texas border colonias, land is sold at a low-cost due to its lack of public infrastructure. These areas may be closer to toxic waste sites. In Southern California, communities of color are more likely to be exposed to environmental hazards like pollution, heat islands, and inadequate water quality. In Central Appalachia, mining and other industries may have caused water and air pollution. Older mobile homes and manufactured units may also have lead paint and asbestos.

- b) **Improving protection from and resilience to environmental harms:**

As noted above, the factory-built replacement homes will be built to a HUD Wind Zone III standard and will be placed on permanent, site-built engineered foundations. In fire-prone areas the exterior sheathing and roof will be constructed of fire-resistant materials. Buyers will be shown how to plant trees and to landscape to both buffer storm winds and create fire wall barriers around the home. Factory-built units will carry a 10-Year Structural Warranty and a Manufacturer's 1-Year Warranty.

- c) **Expanding environmental benefits:**

Replacement home buyers will receive extensive consumer education on how to manage their new homes including how to maximize their energy efficiency and resiliency features. Energy-efficient appliances, solar panels, and water-efficient fixtures will reduce utility costs. The new, factory-built units will be Zero Energy Ready, highly insulated units that will replace poorly insulated, substandard units that were costly to heat and cool. The new units will be far less expensive to operate and will deliver a much better quality of life for their LI/VLI buyers. They will be an attractive model for others who wish to replace their older units as well as to first-time homebuyers, which will lead to improvements in the housing stock as a whole.

Furthermore, the I'm HOME Main Replacement Project will safely decommission and dispose of the older substandard units, some of which will have lead paint and asbestos, which will be an environmental benefit to the wider community.

The energy efficiency components will include:

U.S. DOE Zero Energy Ready Manufactured Home Version 1	U.S. DOE ENERGY STAR® Version 3.0, V.1 Manufactured Home
Required when a manufacturer can deliver the product to a project	Required when DOE ZERH is not available and approved by Next Step*
<ul style="list-style-type: none"> <li>● All electric home systems and appliances</li> <li>● Electric heat pump (heat pump &gt; 7.5</li> </ul>	<ul style="list-style-type: none"> <li>● Electric heat pump (heat pump &gt; 7.5 hspf2 / 14.3 seer2)</li> </ul>

U.S. DOE Zero Energy Ready Manufactured Home Version 1	U.S. DOE ENERGY STAR® Version 3.0, V.1 Manufactured Home
hspf2 / 14.3 seer2) <ul style="list-style-type: none"> <li>● Insulation values to meet local thermal zone</li> <li>● Low-E thermal pane windows</li> <li>● Smart thermostat</li> <li>● LED lighting throughout</li> <li>● All ENERGY STAR® certified appliances</li> <li>● Insulated minimum 36-inch exterior doors</li> <li>● Tight thermal envelope with additional insulation and whole home exhaust system</li> <li>● Minimum size 40-gallon electric water heater</li> <li>● 200 amp panel box</li> </ul>	<ul style="list-style-type: none"> <li>● All electric home systems and appliances</li> <li>● Insulation values to meet local thermal zone</li> <li>● Low-E thermal pane windows</li> <li>● Smart thermostat</li> <li>● LED lighting throughout</li> <li>● All ENERGY STAR® certified appliances</li> <li>● Insulated minimum 36-inch exterior doors</li> <li>● Minimum size 40-gallon electric water heater</li> <li>● 200 amp panel box</li> </ul>

The PRICE Program will give preference to ZERH homes, but in markets where ZERH is not feasible, the developers will utilize an ENERGY STAR® 3.0 home as the minimum standard.

**d) Overcoming prior disinvestment in environmental infrastructure**

This is a scattered-site program designed to replace substandard units and will largely take place in rural areas. Each replacement home package will include (when needed) installation of new wells and septic systems, or connection to public infrastructure (if available). This will be an enormous environmental benefit, because many older units in rural areas have inadequate septic systems, resulting in fecal contamination of groundwater.

***Subfactor (b)(iv): Community Engagement***

● **Seeking and Encouraging Diverse Stakeholder Participation**

The I'm HOME Main Replacement Project was developed with the help of Next Step and the three partner CDFIs, who are knowledgeable of the needs of the communities they serve. Engagement strategies during implementation will include:

- 1. Multilingual Outreach:** NPHS and CDCB provide all marketing materials in English and Spanish, and all community meetings will have bilingual presenters.
- 2. Strategic Community Partnerships:** CDFI partners will work closely with local community organizations, churches, and educational institutions within predominantly minority neighborhoods to disseminate information about housing replacement opportunities.
- 3. Social Media and Local Media Engagement:** CDFI partners will leverage popular social media platforms and collaborate with local media outlets that cater to diverse audiences, including Spanish-language radio stations and newspapers.

**4. Accessibility and Inclusivity:** Marketing materials and events will be accessible to individuals with disabilities. The accessibility features of the replacement housing units will be described to ensure that families with special needs are aware of these options.

**5. Monitoring and Feedback Collection:** CDFI partners will monitor the effectiveness of their marketing strategies and collect feedback from replacement homebuyers served, as well as other community members and stakeholders, and make changes as needed.

Regarding the barriers identified in Factor (a), the I'm HOME Main Replacement Project CDFI partners will address concerns from local stakeholders about the poor quality of manufactured units by sharing the specifications of the new factory-built units that will be provided. CDFI partners will work with local municipalities to streamline permitting and other processes to reduce the timeframe required to replace the substandard units.

- **How Proposal Aligns with Existing Community Plans and Policies**

The Consolidated Plans of the states and jurisdictions in which the CDFI partners will deliver the I'm HOME Main Replacement project all emphasize the need for more affordable housing, especially for communities of color. For example, the **State of Texas 2020 - 2024 Consolidated Plan** specifically identifies residents of colonias as being people of special needs; "Colonias, which are unincorporated residential areas along the Texas-Mexico border that can lack some or all basic living necessities, such as potable water, electricity, paved roads, and safe and sanitary housing, showed very high rates of housing problems" (p. 4). On p. 158, the plan notes that while affordability and availability of housing is a focus of their Needs Assessment, "it should be noted that replacement of a dilapidated unit would also improve the safety of the homeowner."

The **State of California 2020-2024 Federal Consolidated Plan** notes on p. 169 that "Program rules also restrict how a unit is defined, which makes some forms of development that stakeholders want [e.g. manufactured homes] difficult to finance." On p. 192, the plan notes "Communities across the state, particularly in rural areas, need improvements in substandard or missing infrastructure, public facilities, and resources to narrow disparities between these communities and the rest of the state, address the impacts of climate change, and mitigate the increased risk of natural disasters." It also says "Communities exclusively reliant on well water are exceptionally vulnerable to drought and water contamination."

The **Tennessee 2020-2024 Consolidated Plan** notes on p. 89 that "...more vulnerable and LMI populations are at greater risk of being impacted by natural disasters, especially flooding, due to geographic location, housing structure, or both. Historic zoning policies and demographic migration trends have resulted in low income and minority populations often residing in more undesirable and low-lying areas that are more flood prone or are closer to floodplains. These areas also tend to be where trailer parks and mobile homes are located, putting them at greater risk. Mobile homes and manufactured housing units are typically more affordable for LMI populations, but the lack of a foundation and/or other structural elements puts those living inside these units at greater risk of straight-line wind activity and tornados, as well."

Additionally, CDCB maintains an active partnership with the Texas Department of Housing and Community Affairs (TDHCA). CDCB has been both a direct recipient and subrecipient of TDHCA. CDCB maintains an active HOME Investment Partnership Program contract with the agency. These contracts include the following activities: Homebuyer Assistance with New

Construction, Homeowner Reconstruction Assistance, Single Family Development, Tenant Based-Rental Assistance, and Contract for Deed. In addition, CDCB has been the recipient of multiple Low Income Housing Tax Credits (LIHTCs) through TDHCA. As a subrecipient, cdcB served as the administrators of the Cameron County Colonia Self-Help Center. The PRICE grant meets the mission of TDHCA, a state agency responsible for affordable housing, community and energy assistance programs, colonia activities, and regulation of the state's manufactured housing industry.

The **Virginia 2023 – 2027 Consolidated Plan** note on p. 65 that VLI households “also face a shortage of affordable and available units. Currently, there are just 60 affordable and available units per 100 households for VLI households, yielding a statewide deficit of more than 164,000 affordable units. As a result of the affordable housing shortage, 76 percent of VLI households are cost burdened.” Statewide, 43% of all owner-occupied housing units in Virginia were built before 1980. The plan notes that “As of 2021, over 10,000 occupied homes in Virginia do not have adequate indoor plumbing, and nearly 20,000 homes do not have complete kitchen facilities. Although these numbers have declined over the past decade, those remaining units are in remote areas of the state with few resources to address these conditions.”

## **Exhibit E - Factor (c): Capacity**

- **Experience Managing Projects**

The Lincoln Institute of Land Policy is a private operating foundation founded in 1946 to promote the effective use, taxation, and stewardship of land. As an operating foundation, Lincoln Institute employs over 120 professionals in land policy. This staff collectively manage over \$30 million in annual programming supporting over 100 projects in North America, China, Latin America, Europe, and Africa.

Lincoln Institute’s annual programming budget is funded through the proceeds of a private endowment that originates from the family of John C. Lincoln, now valued at over \$702 million and organized to exist in perpetuity. In its 78-year history Lincoln Institute has an unbroken track record of clean financial audits.

Among other projects, Lincoln Institute stewards the Underserved Mortgage Markets Coalition (UMMC). Founded in 2021, the UMMC consists of 32 leading US affordable housing organizations seeking to hold Fannie Mae and Freddie Mac (“the Enterprises”) accountable to their founding purpose: to bring housing finance opportunities to American families not traditionally served by the private market. UMMC focuses on Duty to Serve, a federal regulation that requires the Enterprises to serve three historically neglected markets: manufactured housing, affordable housing preservation, and rural housing. UMMC also focuses on the Equitable Housing Finance regulation which seeks to address racial equity.

In 2022, as part of a multipronged effort to address the housing affordability crisis, Lincoln Institute also began stewarding the Innovations in Manufactured Homes Network (I’m HOME), an initiative to promote manufactured housing as a source of wealth-building home ownership and stable rental housing. Founded in 2005 by Prosperity Now, I’m HOME works to counteract stigma associated with manufactured housing, change public policy, and improve industry practices. The I’m HOME Network provides research, analysis, technical assistance, and engagement with policy makers on issues related to manufactured housing. Members include

homeowners, advocates, academics, policy makers, lenders, manufacturers, developers, and others to effect change in the private sector and at all levels of government. Lincoln Institute's I'm HOME team planned and will implement this PRICE grant proposal, and throughout this proposal we will generally refer to I'm HOME as the applicant.

I'm HOME will implement the I'm HOME Main Replacement Project in large part through its contractor, Next Step Network® (Next Step). Next Step is a nonprofit, national housing intermediary that promotes the expanded use of factory-built housing as a viable solution to address housing affordability. It mobilizes a national network of mission-driven nonprofits who are leaders in the manufactured housing industry, and lending institutions committed to local lending. Next Step's system – Manufactured Housing Done Right® – connects responsible financing, comprehensive homebuyer education, and delivery of high-quality, ENERGY STAR® factory-built homes at scale, creating a model that brings more value to homeowners and communities. Next Step has also established the "Preferred Lender Network," which includes seven private lenders specializing in factory-built housing finance. Preferred Lenders agree to refer customers to the homebuyer education program offered by Next Step, share some consumer loan data, and offer Fannie (MH Advantage) & Freddie's (CHOICEhome) manufactured housing products.

To plan and deliver the I'm HOME Replacement Project, I'm HOME and Next Step assembled a powerful team of nationally recognized industry leaders including Abt Global, NeighborWorks America, and three strong nonprofit CDFIs; Fahe, come dream come build, and Neighborhood Partnership Housing Services. This team has decades of direct experience planning, managing, implementing, and coordinating community development projects like this one.

Letters of support from JPMorgan Chase Bank and the Federal Home Loan Bank of Cincinnati are included in the attachments.

- **Experience Using Grant Funds**

While Lincoln Institute does not yet have direct experience in managing grants from the U.S. Dept. of HUD, the organization has successfully managed significant program-related grants from philanthropic funders. For example, the Kresge Foundation awarded Lincoln Institute a combined total of \$9.8M in grants over a nine-year period to support the work of its Center for Community Investment (CCI). This work helped disadvantaged communities to achieve their economic, social, and environmental priorities through a combination of financial support, technical assistance, leadership development, research, and creating a robust peer network. Since 2017, the Robert Wood Johnson Foundation also has invested over \$14.6M in Lincoln Institute's multi-year work to: 1) transform the community investment system to improve health outcomes for disadvantaged populations; and 2) advance health and racial equity by providing a practical, rigorous, and analytic framework to effectively apply more equitable economic development strategies in small and midsize cities in the United States.

In 2022, Lincoln Institute began exploring the necessary compliance steps to receive federal funding, and established an internal steering committee to review, update, and create policies and procedures that aligned with federal rules and regulations. Lincoln engaged a private consulting firm, Humentum, to audit its policies and procedures, train and educate staff and leadership, and develop an action plan for federal readiness. This work was designed to prepare Lincoln to be compliant with expectations for federal grants, cooperative agreements, subawards, and some

fixed-price and fee-for-service contracts. The full organizational review strengthened Lincoln's internal controls and institutional procedures.

In 2023, Lincoln began receiving and processing a pipeline of over \$5 million in federal awards from the U.S. Department of the Interior (DOI) and the U.S. Department of Commerce (DOC), chiefly managed by Lincoln's Center for Geospatial Solutions in support of Lincoln's land and water mission. Lincoln is current on all reporting and expenditure requirements for these grants and seven other federal awards. The grants include:

1. For DOI, through the U.S. Bureau of Reclamation, Lincoln is currently managing a two-year Secure Water Act Research Grant totaling \$647,000. The project, *Building an Interoperable Data Hub for Western Water Data*, includes management of one \$120,000 subaward to the Western States Water Council.
2. Also for DOI through the U.S. Geological Survey (USGS), Lincoln is currently managing a five-year Cooperative Agreement totaling \$2.5 million, entitled *Operating and Enhancing the Geoconnex System for Water Metadata*. This effort will strengthen water data discovery, management, and governance nationwide.

A significant strength of this proposal is that two of the support contractors and all three CDFI partners in the I'm HOME Replacement Project have staff with extensive experience implementing federal grants. Lincoln will also contract with Abt Global for assistance in meeting the regulatory, financial management and reporting requirements of the PRICE grant. The qualifications of the I'm HOME Main Replacement Project development contractors and CDFI partners are described below, and the Project's organizational chart can be found in Figure 5.

### ***Support Contractors***

#### **Next Step**

Next Step® Network, Inc. is a national, nonprofit housing intermediary that works to promote the expanded use of factory-built housing as a viable solution to address housing affordability. It mobilizes a national network of leaders in the manufactured housing industry and lending institutions serving homebuyers and homeowners in their communities. Next Step's system – Manufactured Housing Done Right® – connects responsible financing, comprehensive homebuyer education and delivery of high-quality, ENERGY STAR® manufactured homes at scale, creating a model that brings more value to the homeowners and communities.

#### **Abt Global**

Abt is a mission-driven consulting firm focused on improving the quality of life and economic well-being of people around the world. Abt has decades of experience providing technical assistance to HUD-funded program grantees and conducting program evaluations. Its team has substantial expertise helping federal grantees understand an array of regulatory requirements, including Community Development Block Grant and HOME Investment Partnership requirements, Disaster Recovery Grant Reporting, environmental reviews, labor standards, fair housing and nondiscrimination, and other federal cross-cutting requirements. Abt also has expertise in conducting program evaluations using qualitative, quantitative, and mixed methods to analyze program processes and outcomes.

#### **NeighborWorks America**



NeighborWorks America was founded in 1978 as a national nonprofit organization and US Department of Housing and Urban Development (HUD) intermediary, NeighborWorks is rooted in transforming neighborhoods through affordable housing and community development. More than 3,500 local and regional nonprofits and municipalities have received training, technical assistance, and grants through NeighborWorks America. Among these are over 240 NeighborWorks affiliates that receive special financial, training, technical, and organizational assessment assistance. NeighborWorks affiliates provide housing counseling services in all 50 states, the District of Columbia, and Puerto Rico. NeighborWorks America is also the nation’s largest trainer of nonprofit affordable housing and community development professionals. It offers a catalog of more than 500 courses annually, 100+ local and regional place-based trainings conducted in local markets, national symposia, and online learning courses.

***CDFI Partners***

The three CDFI partners have significant experience implementing HUD programs as can be seen in Figure 4, below. More detail on their relevant capacity follows Figure 4.

<b>Figure 4</b>	<b>NPHS</b>	<b>CDCB</b>	<b>Fahe</b>
CDBG: 2021 - 2023	\$558,622*	\$1,081,666	\$800,000
HOME: Since 2021-2023	\$450,000*	\$2,602,108	\$20 million+ recycled
Congressionally Directed Spending (HUD)	\$4 million**	–	–
502 Direct Loan (Intermediary Packager)	–	–	\$80 - \$90 million annually
CDFI	\$1,415,000	\$3,387,500	>\$10 million
CDFI Bond Guarantee Funds	–	–	>\$35 million
Outstanding findings/ challenges in expending funds?	None	None	None

\* NPHS serves as the program administrator; municipalities are the direct grantees

\*\* NPHS has just been awarded an additional \$1.6 million

**Neighborhood Partnership Housing Services (NPHS)**

NPHS is a nonprofit community development organization dedicated to building equitable communities in Southern California’s Inland Empire, which includes Riverside and San Bernardino Counties. Established in 1991, NPHS has grown into a sophisticated CDFI providing a comprehensive array of housing and economic development programs and services. NPHS builds manufactured homes that are affordable and climate resilient, using materials and building techniques that enhance durability and reduce maintenance costs while resisting extreme heat and wildfires. NPHS’ projects integrate green building standards which include the use of energy-efficient appliances, solar panels, and water-efficient fixtures that reduce utility costs and environmental impact. NPHS also provides education to homeowners on sustainable practices including energy conservation, water savings, and emergency preparedness to enhance resilience against climate-related events. NPHS is a NeighborWorks affiliate.

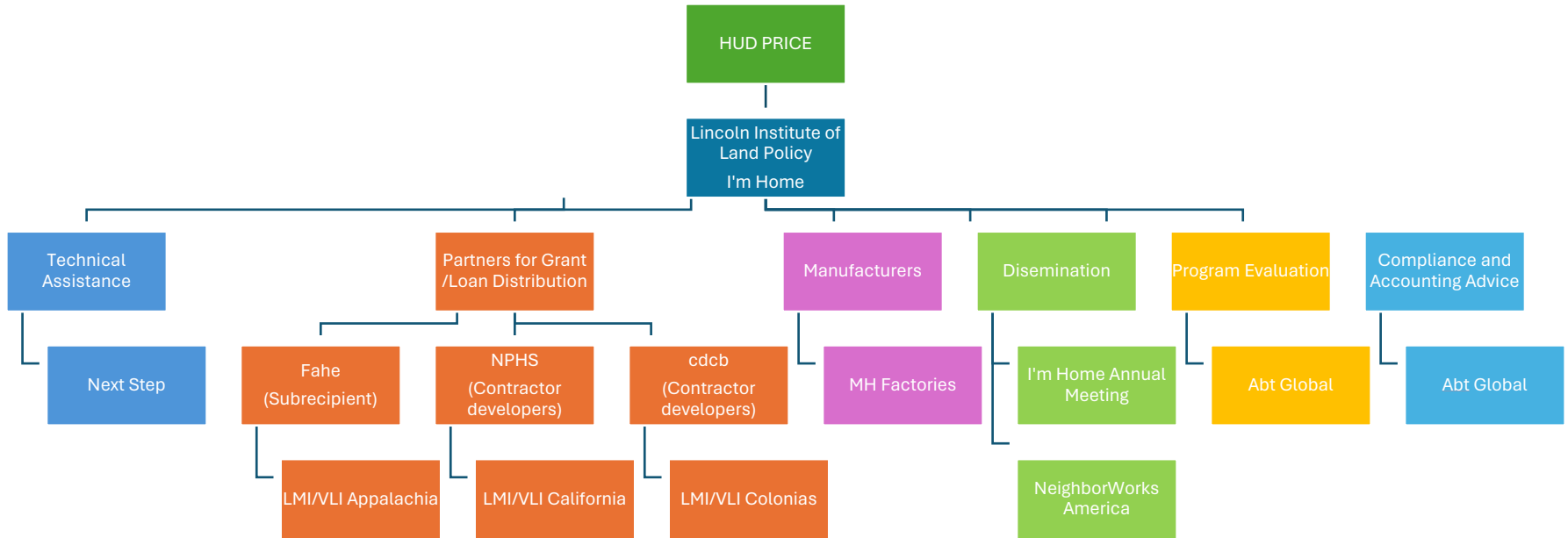
### **come dream.come build (CDCB)**

Founded in 1974, CDCB is a private, non-profit affordable housing organization and CDFI that uses collaborative partnerships to create sustainable communities across the Rio Grande Valley through quality education, model financing, efficient home design, and superior construction. CDCB is one of the largest non-profit producers of single-family housing in Texas. It is an FHA Title I and Title II Direct Endorsement Lender with Wells Fargo and the State of Texas; a Fannie Mae and Freddie Mac-approved seller/servicer, and a Rural Development Lender. In April 2024, CDCB launched DreamBuild, which builds modular units starting at 600 SF that are designed to be expanded in 300 SF modules to add more bathrooms, bedrooms, and other living space. CDCB is a NeighborWorks affiliate.

### **Fahe**

Working with its network of 50+ nonprofit developers across the Appalachian portion of Kentucky, Tennessee, West Virginia, Virginia, Alabama, and Maryland, Fahe uses its expertise in finance, collaboration, innovation, advocacy, and communication to achieve a more prosperous Appalachian region. With a focus on leadership, housing, education, health and social services, and economic opportunity, Fahe empowers the people and communities of Appalachia with the resources, opportunities, and tools needed to build a better life. This creates positive change in one of the poorest and most difficult regions of the country to serve. Fahe is a CDFI, a NeighborWorks affiliate and Fahe is a seller servicer for both Fannie Mae and Freddie Mac.

**Figure 5: Organizational Chart for the proposed I'm HOME Main Replacement Project**



- **Key Staff for the I'm HOME Main Replacement Project**

The I'm HOME Replacement Project has no for-profit partners or subrecipients.

## **The I'm HOME Team**

### **George (“Mac”) McCarthy, PhD - President and CEO**

Before joining the Lincoln Institute in 2014, Mac directed Metropolitan Opportunity at the Ford Foundation, which supported regional planning, and coordinated transportation and housing development to alleviate poverty and reduce its concentration in metropolitan areas in the U.S. and developing countries. Mac provided large founding grants to each of Next Step, Resident Owned Communities USA “ROC USA”, and I'm HOME. All three of these have matured to play key complementary roles in creating a mission-driven ecosystem for manufactured housing. While he won't be directly involved in implementing the I'm HOME Replacement Project, Mac is committed to its success and will provide oversight.

### **Jim Gray, Nonresident Senior Fellow (10-20% FTE Year 1/ 5-10% FTE Year 2-5)**

Jim leads the I'm HOME Network and the Underserved Mortgage Markets Coalition. From 2015 through September 2020, Jim helped create and lead the Duty to Serve Program at the Federal Housing Finance Agency (FHFA), the regulator of Fannie Mae and Freddie Mac. Prior to his work with FHFA, Jim managed the Center for Excellence in Affordable Housing for NCB Capital Impact, now Capital Impact Partners, a national nonprofit organization that provides financing and capacity-building to promote social and economic equity. Jim contributed to building a nationwide shared equity homeownership practice to help address the racial wealth gap. During the Clinton Administration, Jim worked for FHA Commissioners Retsinas and Apgar. For the I'm HOME Main Replacement Project, Jim will lead the launch of the project. For the I'm HOME Main Replacement Project, Jim will lead the launch of the project. He will leverage his deep housing finance and manufactured housing expertise to ensure the program meets objectives and complies with all requirements.

### **Arica Young, PhD, Associate Director (10-20% Year 1/10-15% Year 2-5)**

Arica leads efforts to build, facilitate, and support the Underserved Mortgage Markets Coalition (UMMC) and the I'm HOME Network. She is a seasoned policy, research, and program development professional with expertise that spans economic and community development and resilience, zoning and land use, global trends in low-income and entry-level housing, and alternative community forms. Prior to joining the Lincoln Institute, Arica served as assistant director for the Terwilliger Center for Housing Policy at the Bipartisan Policy Center, where she worked to advance policy change in factory-built housing, zoning and land-use, construction innovation, labor, alternative community design, and rural housing. For the I'm HOME Main Replacement Project, Arica will work closely with Jim Gray in Year 1 and will assume leadership in Years 2 - 6.

### **Lizzie Kazan, Director of Finance (10%/Year)**

Prior to joining LILP, Lizzie was the Director of Contract Administration with an Arizona nonprofit, where she was responsible for allocation accounting for federal projects, grant management, and compliance monitoring of subcontractors. She has a BA in Psychology and an MBA, and prior work experience with vulnerable populations and serving in the Peace Corps. For this project, she will manage payment processing, cash flow management, restricted fund management, budgeting, allocations, financial reporting, fixed asset tracking, timekeeping, internal controls, and adherence to financial policies and procedures.

**Program Manager (New position, to be hired) 100% FTE**

Lincoln Institute will hire an experienced Federal program manager to join the I'm HOME team. This full-time position will require a bachelor's degree in business, public policy, public administration or related field, three to five- years of federal grant and/or cooperative agreement experience under the Code of Federal Regulations and experience managing multi-million dollar federal- or state- grant programs, with preference to those with specific background in managing HUD grants and/or agreements. The program manager will lead and manage the implementation of I'm HOME Main Replacement Project in coordination with a set of expert contractors that will assist with subrecipient training and compliance.

**Grants Compliance Manager (New position, to be hired) 20% FTE**

Lincoln Institute will hire a grants compliance manager to provide analysis, post award services and oversight to ensure compliance with donor requirements for philanthropic awards and with OMB Uniform Guidance and grant-specific requirements for Federal awards. This position will require a bachelor's degree and at least five years of progressive experience in philanthropic and federal grant management, including procurement and subrecipient monitoring. The grants compliance manager will: prepare and review information and reports for internal and external stakeholders; ensure policies and procedures are followed in accordance with all applicable laws, regulations, and donor requirements; assist the program manager in preparations for external monitoring visits, reviews, audits, and cross-site evaluations; conduct routine compliance reviews; provide advice and recommendations regarding procurement actions; ensure subrecipient monitoring procedures comply with federal and other applicable regulations; and coordinate with program manager and subrecipients/contractors/developers to ensure they are compliant with Lincoln Institute policies and PRICE grant requirements.

**Next Step Team**

**Stacey Epperson, President & Founder (15% FTE)**

Stacey received an MPA from Western Kentucky University as a HUD Work/Study Fellow. She serves on the HUD Manufactured Housing Consensus Committee. She has over 30 years of experience in affordable housing development, specializing in manufactured housing, including significant expertise in mobile home replacement in Appalachia. She has extensive knowledge of various federal housing programs, having played consulting roles in CDBG, HOME, SHOP, USDA 502, and FHA programs. Stacey will oversee the team offering technical assistance to the I'm HOME Main Replacement Project CDFI partners.

**Replacement Home Director (New position, to be hired) 100% FTE**

Next Step will recruit an experienced program director to lead all aspects of the technical assistance program. This full-time position will require ten years of experience in affordable housing development, and experience with factory-built housing is preferred. A working knowledge of how to deliver training and technical assistance is required. Duties will include the overall management of the technical assistance program, including assessing partner needs, assembling resources, trainings, and tools. The Director will allocate staff and consultant time to provide technical assistance to the partners, oversee the training plan and assist with securing manufactured housing industry partnerships to deliver the program, and serve as the lead contact for the I'm HOME Main Replacement Project. The Director will allocate staff and consultant time to provide technical assistance to the partners, oversee the training plan and assist with

securing manufactured housing industry partnerships to deliver the program, and serve as the lead contact for the I'm HOME Main Replacement Project.

**Replacement Project Manager (New position, to be hired) 50% FTE**

This position will require three years of experience in affordable housing development and project management expertise. A project management certification and/or BA/BS degree required, as well as a working knowledge of online project management tools. Familiarity with Monday.com and Salesforce a plus. This position will support the Next Step team, coordinating activities, milestones and deliverables for the technical assistance program.

**Amy Barnard, VP of Next Step Homes 20% FTE**

Amy has over 15 years of experience in manufactured housing development and started her career at Clayton Homes as a home product designer. Amy has experience managing housing development projects from concept to completion and holds an AA degree in computer-assisted drafting and design. For the I'm HOME Main Replacement Project, Amy will deliver technical assistance to the nonprofit developers and oversee factory relationships to ensure the homes meet climate resilience and energy efficiency requirements.

**Kelly Fleck, VP of Homeownership - 15% FTE**

Kelly has a BA from Morehead State University and over 20 years of affordable housing experience, including with HUD programs for single-family homes. She has direct experience in mobile home replacement, specifically with supporting homeowners in navigating the replacement process. She leads factory-built homebuyer education and counseling support for Next Step partners. For the I'm HOME Main Replacement Project, Kelly will deliver technical assistance to the nonprofit developers and counselors, supporting their teams to provide homeowners with accurate and up-to-date information on the replacement process, modern factory-built housing, and financing options. She will also work with the CDFI partners to develop effective affirmative marketing and outreach strategies to reach eligible homeowners.

**Abt Global**

**Jeffrey Lubell** is one of the nation's leading experts on local housing policy and the connection between housing and other social policies, including transportation and the environment. At Abt, he has co-led the creation of LocalHousingSolutions.org, a comprehensive knowledge base on U.S. local housing policy, as well as a network of 10 peer cities focused on coronavirus response and racial equity. He is a co-author of a publication for the Bipartisan Policy Center on expanding the use of modular housing in rural communities. From 2000-2003, he was director of the policy development division in HUD's Office of Policy Development & Research. Jeff will serve as the Point of Contact for the I'm HOME Main Replacement Project.

**Jessica Lurz** has over 18 years of experience providing technical assistance to HUD grantees, including for CDBG, HOME, ESG and HOME-ARP federal programs. She has provided TA to entitlement communities on CDBG via webinars, written products, and through direct TA. She also has experience providing direct TA to state and local programs on policies and procedures, cross-cutting federal regulations, and training to ensure compliant programs. Ms. Lurz co-manages the HUD Community Compass Technical Assistance and Capacity Building program for Abt. Jessica will lead the delivery of training and TA to the Project.

### **Dr. Naganika Sanga, PhD**

Naganika's experience focuses on housing policy, urban governance, land use and management, and equity planning in diverse contexts. She uses a mix of qualitative and quantitative approaches, including ethnography, grounded theory, policy analysis, survey design, and community-based participatory action research in her work. She is experienced in leading interdisciplinary research projects and collaborating with government agencies, non-governmental, and community-based organizations. Currently Naganika serves as the Deputy Project Director for Abt's work for HUD to evaluate the Community Choice Demonstration and as lead for Abt's work to design and conduct evaluations of select programs funded through the American Rescue Plan. Naganika will lead the process and outcome evaluation of the project, and the analysis of homeowner experiences.

### **NeighborWorks America**

Sarah Kackar is Director of Rural Initiatives with 25 years of experience working with rural and urban communities. Her most recent work experience at NeighborWorks includes national level rural capacity building and manufactured housing programmatic design, grantmaking, and partnership development. She has secured multi-year, private funding to support rural affiliates alongside programs to increase their work nationwide with manufactured housing. Sarah will serve as NeighborWorks' point person for the I'm HOME Main Replacement Project. Sarah will serve as NeighborWorks' point person for the I'm HOME Main Replacement Project. She will also coordinate completion of the case studies and the Manufactured Housing one-day symposium.

In Year 5 or 6 of the initiative, NeighborWorks will host a day-long Manufactured Housing Symposium at a NeighborWorks Training Institute or similar gathering, to highlight the lessons learned from the I'm HOME Main Replacement Project. NeighborWorks will also complete a case study of each of the three CDFI partners.

### **CDFI Partners – lead staff for the I'm HOME Main Replacement Project**

**Jesse Ibarra, NPHS Chief Business Officer**, will serve as NPHS' lead staff person. **Solon Escobar, Chief Financial Officer** will be responsible for managing the funding.

**Klarissa Garcia, CDCB Grants Coordinator**, will serve as CDCB's lead staff person. **Leonardo Walss, Chief Financial Officer**, will be responsible for managing the funding.

**Traviss Witt, Fahe Advancement Director**, will serve as Fahe's lead staff person. **Brittney Murphy, Executive Vice President and CFO**, will be responsible for managing the funding.

- **Experience Promoting Racial Equity**

As noted above, Lincoln stewards the Underserved Mortgage Markets Coalition (UMMC). One of the two primary focal points of the UMMC is the Equitable Housing Finance plan regulation, recently finalized by FHFA, which tracks the progress of Fannie Mae and Freddie Mac in addressing racial equity issues in the mortgage markets<sup>19F</sup><sup>20</sup>. UMMC members review the

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<sup>20</sup> Fair Lending, Fair Housing and Equitable Housing Finance Plans Final Rule. 12 CFR 1293, 89 FR 42768 (May 16, 2024). <https://www.federalregister.gov/documents/2024/05/16/2024-09559/fair-lending-fair-housing-and-equitable-housing-finance-plans>

Enterprises' EHF plans and activities for impact. The UMMC regularly meets with Fannie, Freddie and FHFA to promote efforts to bring greater racial equity to mortgage markets. A tracking tool for Equitable Housing Finance is in development.

The I'm HOME Replacement Project subrecipient (Fahe) and contract developers (CDCB and NPHS) were certified as CDFIs in part because they serve high-poverty census tracts that are home to high percentages of Black and Brown people. Brief summaries of their work for racial equity include:

**NPHS:** Since 2016, 57% of NPHS' lending has been directed to High Poverty Census Tracts. Currently, 98% of NPHS' lending clients fall within its Target Populations either being low-income, Hispanic, or African American. In addition, 73% of NPHS' lending clients are Hispanic and 20% are African American. NPHS is closing the racial wealth gap by increasing homeownership rates for Hispanic and African American Families.

**CDCB:** In the last three years, the median amount of financing received by Reconstruction clients was \$74,597. The median first mortgage lien for clients was \$113,221.50. Approximately 64% of clients made 80% of the area-median family income or less, and 97% of clients identified as Hispanic/Latino.

**Fahe:** In 2023 alone, Fahe worked with its 50+ members to originate 506 loans totaling \$105,713,066 and leveraging \$5,357,755. In addition, Fahe packaged 371 first mortgages for USDA totaling \$95,930,602. In total, this lending served 460 households with the following characteristics: 183 (39.8%) Minority Headed Households; 291 (63.3%) Female Headed Households; 400 (87%) First Time homebuyers; 84 Loans in Persistent Poverty counties totaling \$12,908,766; 424 Loans in rural areas totaling \$100,097,768; Average AMI of 64.97%. Fahe works directly with local leaders on the ground in the communities it serves or plans to serve. Using their information, it produces an estimate of the racial composition of persons and households in the communities we intend to serve. Fahe also identifies potential barriers for persons or communities of color by conducting market scans and research.

- **Experience Completing Environmental Reviews**

As noted earlier in this section, Lincoln has not had experience in completing environmental reviews for HUD. Next Step on the other hand, has deep experience completing environmental reviews and will lead this effort. In addition, in Year 1, Abt Global is available to provide training and technical assistance to Lincoln Institute, CDFI partners and Next Step, as necessary on systems and processes required to comply with HUD Environmental Review requirements. As noted above in Figure 4, all three CDFI partners have staff experienced in working with HUD CDBG and HOME funding, which also require environmental reviews. This skillset and experience will also support implementation of this PRICE-funded project.

- **Familiarity with Cross-Cutting Federal Requirements**

As noted earlier in this section, Lincoln Institute has completed a lengthy process to prepare for complying with federal grant requirements, but the PRICE grant will be our first experience working with HUD. Again, we will rely in part on our partners who have extensive experience in compliance with HUD cross-cutting federal requirements. In addition, The Abt Global team will provide TA and training to Lincoln Institute/I'm HOME and their contractors and subrecipients during the six-year PRICE award period. The TA will include a focus on compliance with cross-



cutting federal requirements. Abt will provide clear, practical, and applicable program training and support on topics such as which activities are eligible for funding, how to ensure the activities meet a “national objective” under the CDBG program, financial management, fair housing and nondiscrimination, conducting environmental reviews, labor standards, reporting requirements, monitoring subrecipients, and project close-out. While most TA and training will be provided in the first year of the grant award, Abt will be available to provide TA as needed throughout project implementation. Abt will also conduct a process study, outcomes analysis, and analysis of homeowner experience

**Exhibit F Factor (d): Match or Leverage**

Through our partners at CDCB, the I’M HOME Coalition has identified \$1M in matching funds. Moreover, the I’M HOME Coalition partner, NPHS has identified \$500,000 in matching funds.

Through our partners at Fahe and CDCB, the I’m HOME Coalition has also identified approximately \$9.6M in leverage. Fahe has committed \$4.1 in leverage and CDCB has committed \$5.5M in leverage. As certified seller-servicers, Fahe and CDCB will leverage loan capital from the origination of the first mortgages for replacement homebuyers. This leverage accounts for roughly 20 percent of the cost of replacing one unit.

We are confident the I’m HOME Main Replacement Project will be able to leverage PRICE funding precisely because, for the first time, there will be sufficient flexible funding to cover all related costs to the housing replacement for LI/VLI owners. Substandard mobile homes and trailers, especially when clear title is not established, typically cannot be assisted with existing home repair programs because program limits will only cover so much, and program regulations prohibit or actively discourage investing in units that rein such disrepair that they cannot meet code or where long-term ownership cannot be guaranteed. CDFI partners will be able to go to their local, county, state, and foundation funders and demonstrate that PRICE can cover the costs (such as title work or wells) that the other programs cannot. To stretch PRICE grant dollars we will seek funding from programs such as:

Program	Potential Use
CDBG	Demolition, Infrastructure (well/septic/utility hook-ups). This funding could come from state and/or entitlement jurisdictions
HOME	Demolition, Infrastructure (well/septic/utility hook-ups)
Local or state general funds	Demolition, Infrastructure (well/septic/utility hook-ups)
RD 502 Direct 504 Home Repair	Loans or grants that could pay for infrastructure (well, septic)

In addition, the project will leverage significant internal resources from Lincoln, its CDFI partners and support contractors. For example, the Lincoln Institute’s Center for Geospatial Solutions can use data generated by the I’m HOME MReplacementMainReplacementMain Main Main Main Main Main Main Replacement Project for mapping and other visualization purposes. The CDFI partners will provide marketing and outreach assistance, and rely on other internal resources to solve complex unit replacement issues as they come up.

- **Proposal Funding Risks**

Our budget projects that the PRICE grant will cover one hundred percent of the program costs; one advantage of this is that there is no risk of funding loss from other match or leverage sources.

Lincoln Institute worked with Next Step and our three CDFI partners to model the potential costs of replacing substandard pre-1976 mobile homes and pre-1994 manufactured units. If awarded less funding through the PRICE grant we will consider one or more of the following options to adapt to the reduced funding:

- 1) Reduce the projected number of units assisted
- 2) Reduce the number of CDFI partners/target areas to be included in the project
- 3) Scale back the staff to be hired

- **Contingency plan for addressing funding risks**

We planned conservatively for the amount of time it will take to get the project up and running, factoring in the time it will take to execute the agreement with HUD, hire new staff, create the Action Plan and set it up in the Disaster Recovery Grant Reporting (DRGR) System, put in place compliance measures, make adjustments to training and education curricula, and to provide training on use of PRICE grant funds. We project the first units will be replaced beginning in Year 2, and numbers will increase from there. Adding that time to Year 1 provides a buffer if some parts of the startup take longer.

Lincoln/I'm HOME will form a management team to oversee PRICE grant implementation. This will include Jim Gray, Arica Young, the new I'm HOME Main Replacement Project positions of Program Coordinator and the Compliance staff person, Lizzie Kazan, the Lincoln Institute's Finance Director, and Stacey Epperson of Next Step. This core team will meet at least weekly to start, more frequently as needed. The core Management Team will also meet regularly with representatives from the CDFI partners and the contractors.

### **Exhibit G Factor (e): LONG TERM EFFECT**

- **How Proposed Activities Retain Other Affordable Housing Opportunities for LMI Households in the Community**

This is not applicable to our program model. The Project is a largely scattered-site replacement home program targeting VLI/LI owners of substandard mobile homes and manufactured housing in many communities. It will create a replicable model for using factory-built housing as replacement housing for LI/VLI homeowners.

- **Ensuring LMI Households Aren't Priced Out of the Community**

This is not applicable to our program model. This scattered-site replacement home program will target high- and persistent-poverty regions, colonias, and farmworker communities that have suffered decades of disinvestment. These areas are not typically located near amenities that will be attractive to higher-income buyers who would drive prices up, so there is low risk of gentrification.

- **Helping Current Renters and Homesite Renters Become Homeowners**

This is not applicable to our program model. The I'm HOME Replacement Project will not replace units in an investor-owned manufactured housing community or for homesite renters.

- **Ensuring Long-Term Affordability**

The proposed program will carefully underwrite the first mortgages to be affordable to the LI/VLI replacement home buyers, using the HUD standard of paying no more than 30% of income for PITI and utilities. Because of the high replacement cost of homes relative to incomes in these persistent poverty regions, colonias, and farmworker communities, the loan packages will include a zero-interest, soft-second second, zero-interest mortgage or home-only loan that will be forgiven at the end of 31 years or upon sale or transfer of the home. This upfront allocation of PRICE grant funds for the second mortgage/home-only loan will preclude the need for future federal subsidy, and ensure long term affordability.

- **Promoting Stable Homeownership Options in the Long-Term**

The low first mortgage will help ensure stable homeownership for the homebuyers. Replacing substandard mobile or manufactured homes with high-quality, Zero Energy Ready and climate resilient homes will help keep utility costs low. The project will also help assisted households establish clear title to the property, build new wells or septic systems as needed (or connect to public utilities, where available), and safely dispose of the old unit, supporting sustainable homeownership and wealth building.

- **Supporting Underserved Communities for the Long Term**

The I'm HOME Main Replacement Project will target high- and persistent-poverty regions, colonias, and farmworker communities that have suffered decades of disinvestment. Residents of these communities struggle to afford new housing, occupying older units that are poorly insulated and costly to heat and cool. The project will help LI/VLI households replace their old mobile or manufactured units by using an affordable, repayable first mortgage accompanied by a zero interest, soft second mortgage that is due only on sale or transfer and is forgiven at the end of 31 years. We project half of those assisted will be Black or Brown people. By stabilizing their housing costs over the long term, and improving living conditions, the project will help these families build wealth. This will, in turn, allow them to better support their families and their communities.

- **Advancing Housing Access & Justice for Vulnerable Populations and Underserved Communities**

The I'm HOME Main Replacement Project will target high- and persistent-poverty counties and census tracts which have been historically underserved by private lenders and by public investment. Both CDCB and NPHS serve high minority areas and have a lengthy track record of delivering assistance to minority households. Fahe also has a long track record of serving high-poverty households, including minorities, in its Central Appalachian region. Without the assistance from the I'm HOME Replacement Project, it is likely the assisted households would continue to live in their substandard units because the cost of new homes, combined with the site work, title work, well, new septic system, and disposal of the old unit, is prohibitive.

Factory-built housing can produce units more affordably and quickly than site-built, stick-built housing, yet multiple barriers exist to using it at scale. The I'm HOME Replacement Project will

demonstrate that high-quality, energy efficient factory-built housing delivers high customer satisfaction and affordability. By providing training and TA to nonprofit housing developers and lenders, the project will strengthen their local capacity and enthusiasm for using factory-built units to address affordable housing needs. The strategies and lessons learned will create a replicable model for delivering these homes in communities across the country, which will improve housing access and justice for many more people than those who will be assisted directly with this project.

Historically, many of these communities were denied access to legal resources needed to purchase land or through redlining and other forms of discrimination that denied the ability to acquire property at all. Being unable to establish a clear title can force buyers into the personal (home-only) loan market, which results in higher interest rates and shorter loan terms, reducing affordability. This project will help homebuyers resolve title issues that enable their loans to be secured by the real estate, allowing them to access more favorable loan terms.

- **Wealth Building in Underserved Communities, Including those of Color**

The highly insulated, energy-efficient, Zero Energy Ready factory-built homes will keep replacement home buyers' utility costs low going forward. The project will also help replacement home buyers resolve title issues to their lots, which will support wealth building going forward. Affordable debt, a high-quality home, low utility costs, improved infrastructure such as a new well and septic, and title to the property (where possible) will help replacement home buyers build wealth over time.

- **Making Manufactured Housing more Livable, Sustainable, and Resilient**

All factory-built units acquired with PRICE funds will have to meet the specifications identified in Factor (b)(iii): Environment and Resilience. Where needed, the homes will have new wells and/or septic or will be connected to public water and sewer (where available). The new units will incorporate materials and building techniques that enhance durability and reduce maintenance costs while resisting adverse weather conditions such as extreme heat, wildfires, and rain events. Units will have energy-efficient appliances, solar panels, and water-efficient fixtures that reduce utility costs and environmental impact. This makes homes more sustainable but also healthier by improving indoor air quality and comfort. Replacement home buyers will receive education on sustainable practices including energy conservation, water savings, and emergency preparedness to strengthen their resilience against climate-related events.

- **Price Preference Points**

Affordability will be provided by carefully underwritten first mortgages that are affordable to the LI/VLI replacement home buyers, using the HUD standard of paying no more than 30% of their incomes for principal, interest, taxes & insurance (PITI) and utilities. These will be accompanied by zero-interest, soft-second mortgages that will be forgiven at the end of 31 years.

**Attachment A: Advancing Racial Equity narrative**

Lincoln Institute's CDFI partners, Fahe, come dream come build and NPHS, work directly with underserved communities to advance racial equity for BIPOC (Black, Indigenous and people of color) and other marginalized communities.

Below, please see a description of activities and resources for advancing racial equity:

**Analysis of racial composition of the persons/households who are expected to benefit from proposed grant activities:**

The CDFI partners analyze the composition of the households they work with and who are expected to benefit from proposed grant activities. They work directly with local organizations in the communities they serve (or intend to serve) and by using their information and sources of data, produce estimates of racial composition of the individuals served and households they intend to serve. Also, as HUD-approved housing counseling agencies, staff are trained and required to analyze who is served or underserved in their communities. Their in-house data collection enables them to accurately analyze the racial composition of households and individuals who will likely benefit from grant activities. These data driven approaches help identify the specific needs and demographics of the communities impacted by their programs. Furthermore, CDFI partners' outreach teams have strong connections in their target communities which facilitates outreach to those most in need. The three CDFI partners were selected in part because they served high/persistent poverty communities, and two of the three (NPHS and cdc) also have a strong track record of serving Black and Brown communities.

**NPHS Example:** *For FY2023, NPHS served 2,726 clients where demographics were 54% Hispanic, 15% African American, 4% Native American, Native Hawaiian, and Native Alaskan, 8% Asian, and 19% White. This reflects our commitment to serving diverse populations, consistent with the demographic makeup of our target market, which is predominantly 52.4% Hispanic, 27% White, 8.6% African American, and 10.8% Asian.*

**Potential barriers to persons or communities of color equitably benefiting from proposed grant activities:**

The CDFI partners identify potential barriers for communities of color by conducting market scans, research and through continuous engagement with communities. They've identified several barriers that disproportionately affect people of color including:

- **Language and communication barriers** - this include challenges in accessing essential information about housing opportunities due to language differences;
- **Financial accessibility** - higher levels of economic disenfranchisement exist among communities of color, affecting the ability to afford necessary down payments or qualify for conventional financing;
- **Historical mistrust** - which includes residual skepticism from past discriminatory housing practices;
- **Little or limited home buyer education/financial literacy** - due to patterns of past discrimination BIPOC households have lower homeownership levels and often have not had access to pre- and post-purchase homebuyer education and financial literacy coaching. They are less knowledgeable regarding how to maintain their homes, and

manage their finances for sustainable homeownership. It also makes them more vulnerable to predatory lending practices;

- **Inexperience with debt** - many communities use a cash economy and have limited access to traditional financing options for home purchase, maintenance or home rehab; and
- **Prevalence of heirs' property (also known as family land)** creates barriers to using the real estate to secure home purchase or improvement loans because borrowers cannot secure a clear title to the lot on which their units are located. This forces borrowers into the personal loan market, where interest rates are higher and repayment terms shorter, further reducing their affordability. Communities of color disproportionately have units on heirs property due to historic patterns of racism and discrimination.

### **Steps to prevent, reduce or eliminate barriers:**

The CDFI partners work with local community organizations and leaders to design and implement programs that support and benefit them. Over the course of decades working in underserved communities, they have gained knowledge of the generally systemic issues facing communities of color and have adopted practices to best overcome those issues. For example, staff connect with and work through trusted local institutions and organizations to engage underserved communities. The CCDFI partners also utilize products such as the Rural Development 502 Direct Mortgage program, which has been proven to address the lack of housing stock in underserved communities and contribute to the creation of generational wealth. The I'm HOME Replacement Project has been designed intentionally to benefit the lowest income owners of substandard mobile and manufactured units, who are disproportionately BIPOC in two of the three regions we are targeting.

Other targeted measures include offering all communications—including materials, programming, and services—in English and Spanish; using interpreters or language lines to ensure speakers of other languages can also access services; using TTY lines and ASL Interpreters for those with hearing impairments; providing specialized financial assistance programs, such as down payment assistance and subsidized loans, that target historically marginalized groups; and rebuilding trust by partnering with local leaders and organizations within communities of color to ensure important initiatives are perceived as credible and beneficial. The CDFI partners provide group education and individual counseling through various formats including telephone, in-person or virtual, as requested by the customer, plus offer community events in various locations to best serve those who otherwise would not know about the program. All three CDFI offices and community meeting sites are accessible to those with mobility disabilities.

**False Example:** *We adopt a listening and partnering posture in Native and other BIPOC communities. Because of historic racism and discrimination, building trust and proving long-term commitment is key to learning the needs and capacity on the ground and how to access it to inform solutions. Our staff performs outreach, attends information and education sessions, and regularly participates in peer-to-peer conversations with on-the-ground practitioners in those communities.*

Lincoln Institute is deeply committed to racial equity and ensuring programming and resources are made available to underserved communities; its recent work in this respect can be found in Factor (c).

**Measures in place to track progress and evaluate effectiveness of efforts to advance racial equity in grant activities:**

The CDFI partners collect multiple data points throughout the course of a program including household demographics (race, gender, household income), geography served, size of loans, closing times, partner performance, and more. Each CDFI conducts regular analysis of demographics collected to fully understand the populations they serve and expect to serve. As part of that analysis, they look for potential barriers to participation and examine the results of their efforts to remove or address any barriers. Ongoing analysis and evaluation allows them to understand the effectiveness of program actions to advance racial equity in their communities, which will directly relate to their efforts to advance racial equity as part of this grant application.

To monitor effectiveness in advancing racial equity, they do regular impact assessments (once or twice a year) to analyze the racial makeup of project beneficiaries, ensuring their efforts are reaching the intended demographics. They document income and demographic information through documents such as pay stubs, bank statements, tax returns, and W-2 forms to ensure accurate data collection and compliance. The CDFI partners also maintain transparent reporting of progress toward goals of advancing racial equity to keep stakeholders and the community informed, enhancing accountability.

**CDCB Example:** *CDCB will assess its outreach and affirmative marketing efforts and report its results to related organizations and government agencies as requested. This will include a list of outreach methods; an assessment of the success or failure of these methods, which will be determined by comparing the demographic data of clients served with those who applied for services and with the demographics of the area; and all corrective actions to improve affirmative marketing if needed. This may also include additional steps to further market program opportunities to groups who have not been served.*



**Attachment B: Affirmative Marketing Narrative**

Lincoln Institute is deeply committed to racial equity and ensuring programming and resources are made available to underserved communities; its recent work in this respect can be found in Factor (c).

Housing and services offered under the PRICE grant will be broadly and affirmatively marketed to populations who are unlikely or least likely to otherwise know about these programs and services. Affirmatively marketing actions are already in place and will continue to grow throughout this program. Below, please see a description of affirmative marketing activities for each CDFI noted in this application:

**Fahe:** I'm Home Replacement Project assistance available will be affirmatively marketed by nonprofit housing providers, advertised locally and in surrounding counties via social media, print material and local newspapers, as well as public service announcements and direct outreach by community groups. Fahe will provide training and information to nonprofit staff and community leaders regarding the I'm HOME Replacement Project, its eligibility requirements, and encourage application by those least likely to be served. The groups for targeted outreach include Black/Brown persons, Hispanic or Latino individuals that may have limited English proficiency, those with disabilities or families with children. An Affirmative Fair Housing Marketing Plan will be created and available for review upon program approval and initiation. Such activities may include outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group. Documentation of affirmative outreach and marketing activity will be gathered into a narrative that can be shared with Lincoln Institute, HUD, and other interested parties.

**NPHS:** NPHS has a particular focus on low-income families of color, many of whom are Hispanic and non-English speaking. The affirmative marketing strategy is designed to engage communities that are traditionally underrepresented or less likely to apply, ensuring that they are fully aware of and can benefit from our housing opportunities. The Affirmative Marketing Strategy for the I'm Home Replacement Program includes:

- **Multilingual Outreach:** Understanding the language barriers that many in its target demographic face, NPHS provides all marketing materials related to manufactured housing replacement projects in both English and Spanish. This includes detailed brochures, application forms, and online content. NPHS ensures that all communication, from advertisements to community meetings, accommodates non-English speakers to maintain inclusivity.
- **Strategic Community Partnerships:** NPHS collaborates closely with local community organizations, churches, and educational institutions within predominantly minority neighborhoods to disseminate information about housing replacement opportunities. These entities act as trusted liaisons, helping to bridge the gap between NPHS and the communities it aims to serve.
- **Social Media and Local Media Engagement:** To extend its reach, NPHS leverages popular social media platforms and collaborates with local media outlets that cater to diverse audiences, including Spanish-language radio stations and newspapers. Marketing

campaigns are specifically tailored to highlight the benefits of the manufactured housing replacement projects and to guide potential applicants through the application process.

- **Educational Workshops and Community Events:** NPHS organizes workshops and events within community spaces where potential applicants frequent, such as community centers and local schools. These events focus on providing detailed information about the advantages of its manufactured housing replacements, the application process, and available financial assistance programs. They also serve as a platform for direct interaction, allowing potential applicants to ask questions and receive immediate assistance.
- **Accessibility and Inclusivity:** NPHS marketing materials and events are designed to be accessible to individuals with disabilities, ensuring that everyone has the opportunity to learn about and apply for housing. They highlight the accessibility features of replacement housing units in all advertisements to ensure that families with special needs are aware of suitable housing options. The offices of CDFI partners and their community partners, and locations where informational events take place, are accessible to people with mobility disabilities.
- **Monitoring and Feedback Collection:** NPHS continually monitors the effectiveness of its marketing strategies and collects feedback from community members and stakeholders. This feedback helps them refine approaches and address any emerging needs or barriers faced by potential applicants.

NPHS's comprehensive affirmative marketing strategies ensure that manufactured housing replacement projects are accessible and known to all segments of the population, especially those who are least likely to apply without targeted outreach. By implementing multilingual, culturally sensitive, and accessible marketing practices, they aim to empower underrepresented communities to take full advantage of our affordable housing opportunities, promoting diversity and inclusivity within the communities we serve.

**CDCB:** CDCB has a comprehensive marketing strategy to further its program and embrace its commitment to non-discrimination and equal housing opportunity. The affirmative marketing strategies support the objectives of Title VI of the Civil Rights Act & Title VIII of the Civil Rights Act 1968, and as amended in 1988, Executive Order 11063, Executive Order 15063, Section 504 of the Rehabilitation Act of 1973, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Equal Employment Opportunity (Executive Order 15246), MWB Opportunities (Executive Order 15625, 12138, and 12432), Section 3 of the Housing and Urban Development Act of 1968 as amended, Title II of the ADA and Texas Senate Bill 623.

To ensure that all potential applicants and the general public have access to programs, and to ensure that all Federal Fair Housing Laws and Affirmative Marketing Procedures are met, CDCB implements the outreach method listed below. CDCB will:

- Inform the general public and potential applicants through news releases, printed ads, PSA's or other means throughout the target area served by CDCB;
- Posts available information in public places such as community centers and schools, Information is posted in advance of application periods and maintained throughout the

period. All publications or other materials contain required fair housing or equal opportunity language when appropriate.

- Include information targeting home-bound disabled, non-English speaking persons, neighborhood -based organizations in minority neighborhoods and other groups which might not have access to information;
- Maintain information at the cdcb business office which is available to the general public during regular business hours;
- Regularly advertise in the local newspaper and post fliers in the targeted communities at churches, social service organizations, etc. and via Spanish radio;
- Work cooperatively with local organizations which serve the needs of persons protected by the Fair Housing Act such as minority churches, housing agencies, non-profits which serve disabled persons or displaced homemakers, elder care organizations or any other specific organization which provides services in the target area of cdcb;
- Disseminate information through neighborhood leadership through ‘house meetings;’ and
- Employ bilingual staff, plus two staff qualified in American Sign Language. and use TTY lines when needed;
- Use language lines and interpreters to help assist those who speak languages other than English and Spanish.

**Attachment C: Affirmatively Furthering Fair Housing Narrative**

Lincoln Institute is deeply committed to racial equity and ensuring assistance is made available to underserved communities; its recent work in this respect can be found in Factor (c).

All CDFI partners contribute to and review their State and Entitlement Jurisdiction Consolidated Plans and adopt needs and goals as a strategy to affirmatively further fair housing in their target areas. These efforts focus on ensuring access to safe, accessible and healthy housing for protected classes. CDFI partners adhere to the requirements associated with the Fair Housing Act and those outlined at 24 CFR 55.151.

CDFI partners will comply with all Affirmative Marketing and Fair Housing laws and will not deny services to anyone due to discrimination because of race, color, religion, sex, national origin, handicap, familial status, or age or if all or part of the applicant's income derives from any public assistance program.

For the I'm HOME Replacement Project, CDFI partners will target economically distressed areas that have high unemployment and high/persistent poverty. These areas have a lack of access to banking services, a scarcity of quality affordable housing, and a deep need for improved infrastructure. They are also very vulnerable to extreme heat and cold, tornadoes and hurricanes, flooding, and wildfires. Two of the three CDFI partners (cdcb and NPHS) serve high minority populations (predominantly Hispanic).

CDFI partners will support fairness in accessing the I'm HOME Replacement Project by working with community partners and formal and informal leaders to identify and reach out to vulnerable populations that are least likely to apply for housing assistance. Of the 240 estimated units that will be replaced with PRICE funds, 60% will be for low-income and 40% will be for very low-income households. Over half of the assisted households will be Black or Brown.

A key advantage of factory-built homes is that they can be easily customized for people with disabilities, including such features as ramps, lower counters, wider doorways and accessible bathrooms. As described in the Affirmative Marketing attachment, all three CDFI partners will reach out to nonprofits that serve people with disabilities and include in their marketing materials information about how the replacement units can be customized for their needs. In addition, all CDFI partners maintain accessible offices and use TTY lines. All will make marketing and other information available to those who require different formats.

CDFI partners will track and report their marketing and outreach activities to facilitate monitoring of their fair housing efforts. They will also, at minimum, report on the race, ethnicity, and disability status of all those who apply for assistance, as well as those who complete the application process and receive assistance under the I'm HOME Replacement Project.

**Attachment D: Eligible Applicants documentation**

**Eligible Applicants documentation:**

**Lincoln Institute of Land Policy**

**Resolution of Civil Rights Matters**

The Lincoln Institute of Land Policy (Lincoln) does not have any outstanding civil rights matter.

**Timely Submission of Applications**

Lincoln will submit its application prior to the 7/10/2024 at 11:59:59 PM EST deadline.

**Eligible Applicant**

Lincoln is an eligible applicant under the following determination: 25 (Others) Non-profit entities, and has an active SAM.gov registration, UEI GQ8GLCVVMC35

Attached is our 501(c)(3) determination letter. We have included partnership letters in Attachment E.

**Number of Applications**

Lincoln is submitting one (1) application for the PRICE Main Category.



Internal Revenue Service  
Director, Exempt Organizations  
Rulings and Agreements

Department of the Treasury  
P.O. Box 2508  
Cincinnati, Ohio 45201

Date: OCT 29 2007

LINCOLN INSTITUTE OF LAND POLICY  
4835 E CACTUS ROAD  
SCOTTSDALE, AZ 85254-4191

Person to Contact:  
JOE KENNEDY  
ID# 31-08655  
Contact Telephone Numbers:  
513-263-4950 PHONE  
513-263-4590 FAX  
Federal Identification Number:  
86-6021106

Dear Sir or Madam:

In the Internal Revenue Service letter dated January, 1946, we determined that your organization is exempt under Section 501(a) of the Internal Revenue Code, as an organization described in Section 501(c)(3). We further determined that you were a publicly supported organization as a supporting organization within the meaning of Section 509(a)(3) of the Code.

In your letter dated January 10, 2007, you requested confirmation of your classification as a private operating foundation as described in Section 4942(j)(3) of the Code. Based on the information you provided, we have confirmed that you have met the requirements for the requested foundation classification. This letter also recognizes your organization's legal name change from Lincoln Foundation, Inc. to your current name, Lincoln Institute of Land Policy.

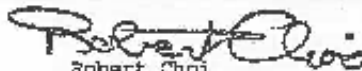
Your exempt status under Section 501(a) of the Internal Revenue Code, as an organization described in Section 501(c)(3) remains in effect.

Grantors and contributors may rely on this determination until the Internal Revenue Service publishes notice to the contrary. However, if you lose your Section 4942(j)(3) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of such status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a Section 4942(j)(3) organization.

Because this letter could help resolve any questions about your exempt status and/or foundation status, you should keep it with your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely,



Robert Choi  
Director, Exempt Organizations  
Rulings and Agreements

**Attachment E: Evidence of Partnership Letters**

**Evidence of Partnership Letters:**

Attached are Letters of Intent and binding Partnership Agreements with its CDFI partners:

- come dream, come build (CDCB)
- Fahe
- Neighborhood Partnership Housing Services, Inc. (NPHS)

Attached are Letters of Intent for its consultants:

- Abt Associates
- NeighborWorks America, Inc.
- Next Step, Inc.



May 20, 2024

George McCarthy  
Lincoln Institute of Land Policy  
113 Brattle Street  
Cambridge, Massachusetts. 02138-3400

Re: Intent to Participate

This letter is to confirm the mutual intent of both the Lincoln Institute of Land Policy (Lincoln) and the Community Development Corporation of Brownsville (dba. cdcb | come dream. come build.) to collaborate and enter into a partner agreement, contingent upon the award of funds from the United States Department of Housing and Urban Development for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in Lincoln's CDBG-PRICE application.

cdcb | come dream. come build. is a private, 501(c)(3) non-profit community housing development organization (CHDO). Founded in 1974, cdcb has been providing safe, sanitary affordable housing to the citizens of South Texas, and is now one of the largest non-profit providers of single-family housing for homeownership in Texas. Since 2009, cdcb has assisted more than 2,000 families with an affordable place to call home and educated an additional 20,000 families with financial and housing counseling. cdcb believes affordable housing, financial security and education creates wealth that sticks for families and communities. cdcb has had considerable experience in all aspects of housing development. cdcb operates four housing and educational lines of business to meet the needs of South Texas including, Single-family homeownership, multi-family rental, Financial Security, and Youth Education & Job Training.

cdcb will serve as a contractor and will be responsible for the identification, decommissioning, and replacement of 100 sub-standard manufactured housing units for low-to-moderate income residents in the following South Texas counties: Cameron, Willacy, Starr, Hidalgo, and Nueces. Replacements will be constructed using cdcb's Dream Build volumetric modular housing model. This model allows families to meet their immediate housing needs, and grow into a larger, energy efficient home as their finances improve, or their family grows. cdcb conducts all activities in-house, including both the manufacturing of the units and mortgage lending services.

[www.cdcb.org](http://www.cdcb.org)  
[info@cdcb.org](mailto:info@cdcb.org)  
(956) 541-4955  
901 East Levee Street  
Brownsville, Tx 78520





It is understood that this letter is only an expression of our intent and a binding partner agreement detailing the terms and conditions of the proposed partnership must be executed before the use of any CDBG-PRICE funds, if awarded.

Thank you,

A handwritten signature in black ink, appearing to read 'Nick Mitchell-Bennett', is written over a large, light blue oval watermark.

Nick Mitchell-Bennett  
Chief Executive Officer

[www.cdcb.org](http://www.cdcb.org)  
[info@cdcb.org](mailto:info@cdcb.org)  
(956) 541-4955  
901 East Levee Street  
Brownsville, Tx 78520



**Partnership Agreement Between**  
**LINCOLN INSTITUTE OF LAND POLICY**  
**AND**  
**COMMUNITY DEVELOPMENT CORPORATION OF BROWNSVILLE**  
**(dba. cdc | come dream. come build.)**  
**FOR**

**Community Development Block Grant Preservation and Reinvestment Initiative for  
Community Enhancement (CDBG-PRICE)**

THIS AGREEMENT is entered into by and between the Lincoln Institute of Land Policy (herein called the "Applicant") and Community Development Corporation of Brownsville (cdc) (herein called the "Partner").

WHEREAS, the Applicant will apply for funds from the United States Department of Housing and Urban Development under the Consolidated Appropriations Act, 2023, Public Law 117-328, for the Community Development Block Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition; and

WHEREAS, the Applicant wishes to engage the Partner to assist the Applicant in using such funds if awarded;

NOW, THEREFORE, it is agreed between the parties hereto, contingent upon the award of CDBG-PRICE funds to the Applicant, that:

**I. CONTRACTOR DEVELOPER AGREEMENT/CONTRACT**

If the Applicant is awarded a CDBG-PRICE grant from HUD, and if the Applicant is awarded a waiver to forego the competitive procurement process to contract with the Partner, the Applicant/Grantee shall execute a written subrecipient agreement, developer agreement, contract, or other agreement, as applicable, with the Partner, for the use of the CDBG-PRICE funds before disbursing any CDBG-PRICE funds to the Partner. The written agreement must conform with all CDBG-PRICE requirements and shall require the Partner to comply with all applicable CDBG-PRICE requirements, including those found in Consolidated Appropriations Act, 2023 (Public Law 117-328), title I of the Housing and Community Development Act of 1974 (42 USC 5302 et seq.), the CDBG program regulations at 24 CFR part 570, the Notice of Funding Opportunity for HUD's Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement competition and any subsequent published amendments (the CDBG-PRICE NOFO), and the Applicant's CDBG-PRICE application.

## II. SCOPE OF SERVICE

### A. Activities

The Partner will be responsible for using CDBG-PRICE funds to carry out activities in a manner satisfactory to the Applicant and consistent with any standards required as a condition of providing these funds. Such use will be in compliance with the CDBG-PRICE NOFO, the Applicant/Grantee's application for CDBG-PRICE assistance and the Applicant/Grantee's Grant Agreement for CDBG-PRICE. Such use will include the following activities:

#### Program/Project Delivery

**Activity #1: Replacement of 100 sub-standard manufactured housing units for low-to-moderate income homeowners in the following Texas Counties: Cameron, Starr, Hidalgo, Willacy and Nueces.** This activity encompasses the removal and decommission of the existing manufactured housing units, and the construction and installation of a new volumetric modular housing unit, using cdc's DreamBuild housing model.

**Activity #2: Client outreach and identification.** The Partner's marketing and outreach team will conduct targeted outreach to communities in the designated service area, utilizing in-person and digital forms of communication to establish a pipeline of CDBG-PRICE eligible clients.

**Activity #3: Provision of HUD certified housing counseling services.** The Partner is a HUD certified housing counseling agency and employs three HUD certified counselors. They will work with clients to ensure that clients have the necessary financial literacy skills and resources to maintain their mortgage payments.

**Activity #4: Mortgage Lending Services.** The Partner is a full cycle mortgage lender and servicer and employs a lending team that works with clients to find the best financing option available. A variety of loan products will be offered to ensure that clients' needs are met.

### B. Project Schedule

The Partner agrees to implement the following:

Estimated Project Start Date: 10/01/2024

Estimated Project End Date: 09/30/2030

The programs outlined in Section II A. Activities are established programs. If the grant is awarded, the Partner will be ready to begin activities starting on the date that the contractor developer agreement is executed.

### C. Staffing

The following Partner staff members will be critical to the implementation of the activities outlined in Section II:

Director of Real Estate Development, Leo Barrera: Responsible for the oversight of all Real Estate Development activities, including obtaining environmental clearance, conducting home inspections, and obtaining all necessary permits.

DreamBuild Program Manager, Danny Hawkins: Oversees the manufacturing and installation of DreamBuild units.

Director of Marketing, PR, and Communications, Marcela Saenz: Oversees all marketing and outreach efforts.

Rural and Colonia Outreach Specialist, Norma Villarreal: Conducts targeted outreach and builds relationships with residents of the service area.

Director of Homeownership, Linda Marin: Responsible for overseeing both the lending and housing counseling teams.

Any changes in the Key Personnel assigned or their general responsibilities under this project are subject to the prior approval of the Applicant/Grantee.

### **III. BUDGET**

To conduct the activities outlined in Section II, the Partner will require \$21,826,495 in CDBG-PRICE funding. The total project cost amounts to \$27,765,346.

The Partner will provide \$5,938,851 in matching funds. cdc is a seller/servicer of Freddie Mac and Fannie Mae loan products. Additionally, the Partner originates loans funded by the Rio Grande Valley Multibank CDFI. The RGVMB is a member of the Federal Home Loan Bank of Dallas. It is anticipated that all matching funds will come from:

- Freddie Mac Loan Proceeds
- Fannie Mae Loan Proceeds
- Rio Grande Valley Multibank Loan Proceeds
- JP Morgan Chase Grant Funds

The Applicant/Grantee may require a more detailed budget breakdown than the one contained herein, and the Partner shall provide such supplementary budget information in a timely fashion in the form and content prescribed by the Applicant/Grantee. Any amendments to the budget must be approved in writing by both the Applicant/Grantee and the Partner.

### **IV. SEVERABILITY**

If any provision of this Agreement is held invalid, the remainder of the Agreement shall not be affected thereby and all other parts of this Agreement shall nevertheless be in full force and effect.

### **VI. SECTION HEADINGS AND SUBHEADINGS**

The section headings and subheadings contained in this Agreement are included for convenience only and shall not limit or otherwise affect the terms of this Agreement.



**VII. WAIVER**

The Applicant's failure to act with respect to a breach by the Partner does not waive its right to act with respect to subsequent or similar breaches. The failure of the Applicant to exercise or enforce any right or provision shall not constitute a waiver of such right or provision.

**VIII. ENTIRE AGREEMENT**

This Agreement between the Partner and the Applicant for the use of CDBG-PRICE funds, supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between the Partner and the Applicant/Grantee with respect to this Agreement. By way of signing this agreement, the Partner is bound to perform the agreements within this agreement or any HUD approved amendment thereof. Any amendment to this agreement must receive prior approval by HUD.

Date: 5/29/2024

IN WITNESS WHEREOF, the Parties have executed this contract as of the date first written above.

Lincoln Institute of Land Policy

COMMUNITY DEVELOPMENT  
CORPORATION OF BROWNSVILLE  
(dba. cdc | come dream. come build.)

DocuSigned by  
*George W. "Mac" McCarthy*  
By \_\_\_\_\_  
George W. McCarthy  
President and CEO

DocuSigned by  
*Nick Mitchell-Bennett*  
By \_\_\_\_\_  
Nick Mitchell-Bennett  
Chief Executive Officer

**Mr. Jim Gray, Senior Advisor**

**Lincoln Institute of Land Policy**

**1200 G Street NW, Suite 240**

**Washington, DC 20005**

**Re: Intent to Participate**

This letter is to confirm the mutual intent of both the Lincoln Institute of Land Policy (Lincoln) and the Federation of Appalachian Housing Enterprises Inc. (dba Fahe Inc.) to collaborate and enter into a partner agreement, contingent upon the award of funds from the United States Department of Housing and Urban Development for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in Lincoln's CDBG-PRICE application.

Fahe is a purpose-oriented network of 50+ diverse community-based nonprofits serving the Appalachian states of Kentucky, Tennessee, Virginia, West Virginia Maryland and Alabama. Fahe Members are often the primary developers of housing in their communities for units that families can afford. For the growth of our regional economy, we collaborate across state lines to identify and take to scale models that support the establishment of organizational capacity, leadership and stability needed to attract or grow industry partners that are key to development and delivery of high performing, affordable homes to working age households.

Fahe is dedicated to supporting local leaders, building thriving communities, and expanding economic opportunity for all people. Throughout the course of our 44 years, Fahe has invested over \$1.91B which generated \$1.76B in finance. These investments have been channeled through our Members and community partners, directly changing the lives of 941,707 people with services like affordable housing, community development, substance use recovery, homelessness prevention, and access to food systems.

Fahe will participate with Lincoln's PRICE application as a Subrecipient serving the Central Appalachian Region. Fahe will work with our Members in the identified region of Northeast Tennessee and Southwest Virginia to provide marketing and education on the CDBG PRICE program as Members are the affordable housing providers that are boots-on-the-ground in our service area. Experience and other published research lead Fahe Members to confirm that housing is a foundational building block to greater financial security as well as a benefit to other individual socioeconomic and community metrics of



**fahe**  
Strength in Numbers

619 Oak St. | Berea, KY 40403  
859.986.2321 | [www.fahe.org](http://www.fahe.org)

health and well-being for families. This program will address in a comprehensive manner the issue of aging mobile homes that plagues our service area with an opportunity to provide more efficient, high performing units that will enhance the creation of wealth for working families. Our goals include breaking the generational cycles of poverty that will benefit the individuals, families, communities and the region overall. Fahe as Subrecipient will serve as the fiduciary entity for disbursement of funds utilized in the PRICE program providing oversight and program administration.

It is understood that this letter is only an expression of Fahe's intent to participate in the implementation of this PRICE application if funded; a binding partner agreement detailing the terms and conditions of the proposed partnership will be executed before the use of any CDBG-PRICE funds, if awarded.

**Fahe Inc.**

*Sara Morgan*

**Sara Morgan**

**President**

**Partnership Agreement Between  
Lincoln Institute of Land Policy  
AND  
Federation for Appalachian Housing Enterprises, Inc.  
FOR  
Community Development Block Grant Preservation and Reinvestment Initiative for  
Community Enhancement (CDBG-PRICE)**

THIS AGREEMENT is entered into by and between the Lincoln Institute of Land Policy (herein called the "Applicant") and Federation for Appalachian Housing Enterprises, Inc. (herein called the "Partner").

WHEREAS, the Applicant will apply for funds from the United States Department of Housing and Urban Development under the Consolidated Appropriations Act, 2023, Public Law 117-328, for the Community Development Block Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition; and

WHEREAS, the Applicant wishes to engage the Partner to assist the Applicant in using such funds if awarded;

NOW, THEREFORE, it is agreed between the parties hereto, contingent upon the award of CDBG-PRICE funds to the Applicant, that:

**I. SUBRECIPIENT AGREEMENT AGREEMENT/CONTRACT**

If the Applicant is awarded a CDBG-PRICE grant from HUD, the Applicant/Grantee shall execute a written subrecipient agreement, developer agreement, contract, or other agreement, as applicable, with the Partner, for the use of the CDBG-PRICE funds before disbursing any CDBG-PRICE funds to the Partner. The written agreement must conform with all CDBG-PRICE requirements and shall require the Partner to comply with all applicable CDBG-PRICE requirements, including those found in Consolidated Appropriations Act, 2023 (Public Law 117-328), title I of the Housing and Community Development Act of 1974 (42 USC 5302 et seq.), the CDBG program regulations at 24 CFR part 570, the Notice of Funding Opportunity for HUD's Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement competition and any subsequent published amendments (the CDBG-PRICE NOFO), and the Applicant's CDBG-PRICE application.

## II. SCOPE OF SERVICE

### A. Activities

The Partner will be responsible for using CDBG-PRICE funds to carry out activities in a manner satisfactory to the Applicant and consistent with any standards required as a condition of providing these funds. Such use will be in compliance with the CDBG-PRICE NOFO, the Applicant/Grantee's application for CDBG-PRICE assistance and the Applicant/Grantee's Grant Agreement for CDBG-PRICE. Such use will include the following activities:

Partner will work with approximately four of its member organizations to market/outreach in local communities in the Northeast Tennessee and Southwest Virginia geographic target area to accomplish the following activities:

Activity#1 Marketing - Develop a marketing campaign with tools/ads/print material to facilitate outreach in local communities for four of the Partner's members. Marketing will be important to build a pipeline of clients for the PRICE Program. From the Pipeline, eligible families will be selected and contacted for participation.

Activity #2 Members initiate Program Processes - Eligible participants will have their property inspected and documented for eligibility, Partner members will work with the families, providing housing counseling, financial management, and budgeting for success as a PRICE participant. Members will begin any activities required for the removal/demolition of the existing mobile home - this will include any needed asbestos testing and removal, lead based paint testing and removal, decommissioning of the old mobile home with appropriate demolition, removal, and documented disposal.

Activity #3 Replacement Housing Selection – Families will work with Partner members for selection of the new manufactured replacement units to be purchased to assure sufficient housing occupancy, appropriate placement on the property with all site development requirements including any required grading, water and sewer supply for the unit, installation of foundation with appropriate electric and plumbing as necessary for placement of the new manufactured unit for the family.

Activity #4 Closings with the family on the financing package for the purchase of the new unit will be conducted to finalize the program activities in communities. The Partner will review this activity for closing documents for quality assurance.

Activity #5 Financial Review – The Partner will provide financial management for all program transactions throughout the program activities to assure compliance as the Subrecipient with PRICE Program requirements. The Partner will serve as a financial intermediary for its members providing oversight on all requests and expenditures of program funds.

Activity #6 Compliance – throughout all program activities, the Partner will be in review and oversight for compliance with the PRICE program and HUD standard requirements. This includes written policies and adherence, monitoring documentation and records pertaining to

eligibility and fair/best practices, and financial compliance to the program in accordance with 2 CFR 200.

**B. Project Schedule**

The Partner agrees to implement the following:

Months 1-4: access HUD PRICE training, signing of required Agreements/documents, Partnership MOAs, hiring Project Manager, procuring any needed equipment.

Months 5-12: Creating a marketing campaign, Partner member utilizing marketing material to do specific outreach in local communities to build a pipeline and educate the public. Initiate client selection based on eligibility requirements of PRICE.

Year 2: Partner members (4+) continue to market, outreach, evaluate methodology, work with first three families to participate in the testing, demolition/removal of old mobile home, foundation for new mobile homes, client selection of replacement home, ordering, delivery and setting new manufactured unit; repeat process for next clients.

Total replacement units Year 2: 13

Year 3: Continue to Market, Members do outreach, evaluate methodology, work with families to participate in the testing, demolition/removal of old mobile home, foundation for new mobile homes, client selection of replacement home, ordering, delivery and setting new manufactured unit; repeat process for next clients.

Total replacement units Year 3: 16

Year 4: Continue to Market, Members do outreach, evaluate methodology, work with families to participate in the testing, demolition/removal of old mobile home, foundation for new mobile homes, client selection of replacement home, ordering, delivery and setting new manufactured unit; repeat process for next clients.

Total replacement units Year 4: 16

Year 5: Continue to Market, Members do outreach, evaluate methodology, work with families to participate in the testing, demolition/removal of old mobile home, foundation for new mobile homes, client selection of replacement home, ordering, delivery and setting new manufactured unit; repeat process for next clients.

Total replacement units Year 5: 16

Year 6: Continue to Market, Members complete outreach, work with final families to participate in the testing, demolition/removal of old mobile home; foundation for new mobile homes, client selection of replacement home, ordering, delivery and setting of new manufactured replacement units.

Total replacement units Year 6: 16

Total Replacement units: 77

**C. Partner Staffing**

1. Project Manager – Direct management of the Partner Subrecipient duties for PRICE project management working with Members.
2. Project Supervisor – provides oversight of the PRICE program management, supports the Project Manager.
3. Project Assistant/Coordinator – assists Project Manager with meeting logistics, calendar coordination.
4. VP of Grants and Contracts – Oversight of PRICE grant milestones/deadlines on production, financial expenditures, and reporting.
5. JustChoice Lending Staff – assist with marketing material for first mortgage options for low-income borrowers in the PRICE Program; expertise with financial package for PRICE family participation closing documents compliance.
6. VP of Finance; Finance staff – provide financial management and appropriate allocation of expenses for the PRICE program as well as all required GAAP accounting requirements in the disbursement of the program funds per 20 CFR 200.

**III. BUDGET**

The Applicant/Grantee may require a more detailed budget breakdown than the one contained herein, and the Partner shall provide such supplementary budget information in a timely fashion in the form and content prescribed by the Applicant/Grantee. Any amendments to the budget must be approved in writing by both the Applicant/Grantee and the Partner.

Personnel (Direct Labor)	\$276,257
Fringe Benefits	\$82,877
Travel	\$8,390
Construction	\$16,317,200
Other Direct Costs	\$2,401,600
Indirect Costs	\$2,850,000
<b>Total:</b>	<b>\$21,936,324</b>

**IV. SEVERABILITY**

If any provision of this Agreement is held invalid, the remainder of the Agreement shall not be affected thereby and all other parts of this Agreement shall nevertheless be in full force and effect.

**VI. SECTION HEADINGS AND SUBHEADINGS**

The section headings and subheadings contained in this Agreement are included for convenience only and shall not limit or otherwise affect the terms of this Agreement.

**VII. WAIVER**

The Applicant's failure to act with respect to a breach by the Partner does not waive its right to act with respect to subsequent or similar breaches. The failure of the Applicant to exercise or enforce any right or provision shall not constitute a waiver of such right or provision.

**VIII. ENTIRE AGREEMENT**

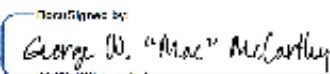
This Agreement between the Partner and the Applicant for the use of CDBG-PRICE funds, supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between the Partner and the Applicant/Grantee with respect to this Agreement. By way of signing this agreement, the Partner is bound to perform the agreements within this agreement or any HUD approved amendment thereof. Any amendment to this agreement must receive prior approval by HUD.

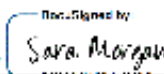
Date: 5/29/2024

IN WITNESS WHEREOF, the Parties have executed this contract as of the date first written above.

Lincoln Institute of Land Policy

Federation for Appalachian Housing Enterprises, Inc.

By   
George W. McCarthy  
President and CEO

By   
Sara Morgan  
President





9551 Pittsburgh Avenue  
Rancho Cucamonga, CA 91730  
(909) 988-5979  
www.nphsinc.org

May 28, 2024

Neighborhood Partnership Housing Services, Inc.  
9551 Pittsburgh Ave,  
Rancho Cucamonga, CA 91730

**Re: Intent to Participate**

This letter is to confirm the mutual intent of both the Lincoln Institute of Land Policy (Lincoln) and Neighborhood Partnership Housing Services, Inc. to collaborate and enter into a partner agreement, contingent upon the award of funds from the United States Department of Housing and Urban Development for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in Lincoln's CDBG-PRICE application.

NPHS is a nonprofit 501(c)(3) community development organization dedicated to building equitable communities since 1991. Established in the City of Montclair as a grassroots neighborhood organization, NPHS has grown into a sophisticated affordable housing developer and Community Development (CDFI) providing a comprehensive array of housing and economic development programs and services throughout Southern California, with a focus on Riverside, San Bernardino and Eastern Los Angeles Counties. While applying a holistic approach to community and economic development, NPHS' work is focused around five areas of impact: Affordable Housing, Neighborhood Revitalization, Community Wealth Building & Preservation, Green Building and Environmental Sustainability, and Job Creation.

NPHS' comprehensive suite of programs and services has significantly influenced the landscape of affordable housing development. By integrating innovative housing solutions with strategic economic development initiatives, NPHS has served over 50,000 low-to-moderate income families, channeling more than \$4.6 billion directly into local communities. This profound impact reflects its enduring commitment to fostering sustainable growth and enhancing the quality of life for residents throughout the regions it serves.

The proposed partnership structure positions NPHS as a Contractor Developer, focusing specifically on the replacement of manufactured housing units while leveraging its expertise as a Community Development Financial Institution (CDFI) lender and HUD-Approved Counseling Agency. NPHS will leverage its extensive experience and established capabilities to ensure the success of these replacement projects.

## Partner's Proposed Role and Duties

### 1. Community Development Financial Institution (CDFI) Lender:

NPHS will utilize its status as a Community Development Financial Institution (CDFI) to provide tailored lending services for the replacement of manufactured homes. With a robust background in financial management and lending, NPHS is adept at managing fund allocation and utilization efficiently. Responsibilities include processing loan applications, disbursing funds, and managing financial transactions to ensure that the resources are directed effectively towards the project goals.

### 2. Manufactured Home Supplier:

As a licensed dealer of manufactured homes, NPHS will supply high-quality replacement units. This role leverages strong partnerships with reputable manufacturers to provide a variety of home options that meet the specific needs of the communities served. NPHS will manage all aspects related to the procurement, delivery, and installation of new manufactured homes, ensuring compliance with all regulatory standards and project timelines.

### 3. Comprehensive Homeownership Education and Counseling Provider:

NPHS will enhance the project by offering a suite of supplemental services aimed at supporting the success and sustainability of the housing replacements:

Eligibility Determination: Verifying that all participants meet the project's eligibility criteria.

- **Financing Assistance:** Assisting beneficiaries in navigating the financing options available to secure necessary funds.
- **Homebuyer Education:** Conducting educational programs to equip new homeowners with the knowledge needed for successful homeownership.
- **Monitoring and Compliance:** Regular monitoring to ensure ongoing compliance with project standards and objectives.
- **HUD-certified Counseling:** Providing expert guidance and support through HUD-certified counselors to empower beneficiaries throughout their transition to new homes.

### 4. Resource Leveraging:

NPHS will capitalize on its extensive network and strategic relationships to enhance the financing structure of the replacement projects. This involves collaborating with other community organizations, accessing public and private funding sources, and employing innovative financing strategies to maximize the impact and reach of the project funds.

In this partnership, NPHS brings critical expertise and resources to the table, ensuring that the replacement of manufactured homes is conducted efficiently, effectively, and sustainably. By concentrating on these specialized roles, NPHS aims to deliver significant improvements in housing quality and stability for the communities it serves, making a lasting impact through enhanced living conditions and economic opportunities.

It is understood that this letter is only an expression of our intent and a binding partner agreement detailing the terms and conditions of the proposed partnership must be executed before the use of any CDBG-PRICE funds, if awarded.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Mojica', with a large loop on the left side and a horizontal stroke extending to the right.

Clemente Mojica  
President and CEO  
Neighborhood Partnership Housing Services, Inc.

**Partnership Agreement Between  
LINCOLN INSTITUTE OF LAND POLICY  
AND  
NEIGHBORHOOD PARTNERSHIP HOUSING SERVICES, INC.  
FOR  
Community Development Block Grant Preservation and Reinvestment Initiative for  
Community Enhancement (CDBG-PRICE)**

THIS AGREEMENT, entered into by and between the Lincoln Institute of Land Policy (herein called the "Applicant") and Neighborhood Partnership Housing Services, Inc. (herein called the "Partner").

WHEREAS, the Applicant will apply for funds from the United States Department of Housing and Urban Development under the Consolidated Appropriations Act, 2023, Public Law 117-328, for the Community Development Block Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition; and

WHEREAS, the Applicant wishes to engage the Partner to assist the Applicant in using such funds if awarded;

NOW, THEREFORE, it is agreed between the parties hereto, contingent upon the award of CDBG-PRICE funds to the Applicant, that: **I. DEVELOPER AGREEMENT/CONTRACT**

If the Applicant is awarded a CDBG-PRICE grant from HUD and if the Applicant is awarded a waiver to forego the competitive procurement process to contract with the Partner, the Applicant/Grantee shall execute a written developer agreement, contract, or other agreement, as applicable, with the Partner, for the use of the CDBG-PRICE funds before disbursing any CDBG-PRICE funds to the Partner. The written agreement must conform with all CDBG-PRICE requirements and shall require the Partner to comply with all applicable CDBG-PRICE requirements, including those found in Consolidated Appropriations Act, 2023 (Public Law 117-328), title I of the Housing and Community Development Act of 1974 (42 USC 5302 et seq.), the CDBG program regulations at 24 CFR part 570, the Notice of Funding Opportunity for HUD's Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement competition and any subsequent published amendments (the CDBG-PRICE NOFO), and the Applicant's CDBG-PRICE application.

## II. SCOPE OF SERVICE

### A. Activities

The Partner will be responsible for using CDBG-PRICE funds to carry out activities in a manner satisfactory to the Applicant and consistent with any standards required as a condition of providing these funds. Such use will be in compliance with the CDBG-PRICE NOFO, the Applicant/Grantee's application for CDBG-PRICE assistance and the Applicant/Grantee's Grant Agreement for CDBG-PRICE. Such use will include the following activities:

#### Program/Project Delivery

**Activity #1 Lending Services:** As a Community Development Financial Institution (CDFI), the Partner will offer lending services to facilitate the financing of manufactured home replacement projects. This will include providing affordable financing options tailored to the needs of farmworker families. Activities included but not limited to outreach, client intake, processing, underwriting, compliance, and reporting.

**Activity #2 Manufactured Home Replacement:** The Partner will provide access to high-quality, affordable manufactured homes to replace aging and dilapidated units in Polanco parks. This includes supplying new manufactured homes and facilitating the replacement process from start to finish. Activities include technical assistance, pricing, model selection, and more.

**Activity #3 Supportive Services:** The Partner will offer supportive services to assist beneficiaries throughout the manufactured home replacement process. This includes eligibility determination, financial counseling, homebuyer education, and assistance with accessing public funding sources.

**Geographic Target Area:** The geographic target area for this initiative is Riverside County, with a specific focus on the Eastern Coachella Valley. This region houses the largest population of farmworkers living in Polanco parks in California, making it a priority area for addressing affordable housing needs.

**Target Population:** The target population for this initiative is low-income manufactured homeowners residing in Riverside County with a special focus on farmworker families residing in Polanco parks in the Eastern Coachella Valley. These families represent a vital labor force in the agriculture industry, contributing over \$700 million to the local and regional economies. Despite their significant contributions, they lack basic infrastructure, affordable housing, and economic development opportunities.

**Method of Delivery:** The Partner will adopt a cooperative approach to deliver products and services to the target population. This involves working closely with community stakeholders, including farmworker families, local organizations, government agencies, and other partners, to ensure the successful implementation of the initiative. The Partner will leverage its expertise as a CDFI and HUD-certified counseling agency to provide tailored solutions that meet the unique needs of farmworker families in the Eastern Coachella Valley.

### B. Project Schedule

The Partner agrees to implement the following:

1. October 2024 - December 2024:
  - Program Development and Planning
  - Staff Training
  - Outreach and Engagement with Target Communities
  - Coordinate outreach with Local Agencies and Organizations
2. January 2025 - December 2025:
  - Program Launch and Implementation
  - Application Intake and Processing
  - Homeowner Eligibility Determination
  - Manufactured Home Replacement Initiation
  - Begin Lending and Supportive Services
3. January 2026 - December 2026:
  - Continuation of Manufactured Home Replacement
  - Ongoing Lending and Supportive Services
  - Monitoring and Evaluation of Program Impact
  - Outreach and Expansion of Program Reach
4. January 2027 - December 2027:
  - Completion of Manufactured Home Replacements
  - Increased Focus on Supportive Services
  - Data Analysis and Reporting
  - Stakeholder Engagement and Community Feedback Sessions
5. January 2028 - December 2028:
  - Program Enhancement and Improvement Efforts
  - Review of Program Effectiveness
  - Adjustment of Program Components as Needed
  - Continuous Outreach and Engagement Activities
6. January 2029 - December 2029:

- Sustainability Planning for Program Continuation
- Long-Term Impact Assessment
- Knowledge Sharing and Best Practices Dissemination
- Evaluation of Potential Expansion Opportunities

7. January 2030 - September 2030:

- Final Year of Program Implementation
- Wrap-Up Activities and Completion of Remaining Tasks
- Preparation of Final Reports and Documentation
- Reporting of Program Achievements and Impact

C. Partner Staffing

Any changes in the Key Personnel assigned or their general responsibilities under this project are subject to the prior approval of the Applicant/Grantee.

**Executive Management**

Clemente Mojica, President and CEO; Solon Escobar, Chief Financial Officer; Greg O'Donnell, Chief Impact Officer; Jesse Ibarra, Chief Business Officer

**Management and Implementation, Administration, Manufactured Home Replacement, Pricing, Project Management**

RaShawna Fahie, Manufactured Housing Program Manager; April DeLeon, Redevelopment Senior Project Manager; Gabriela Lopez, Project Coordinator; Andy Lopez, Assistant Project Manager

**Education, HUD Counseling, Eligibility Determination, Intake, Data Collection, Entry, Reporting, Loan Underwriting**

Lisa Ralph, Director of Homebuyer Development and Preservation; Curtis Miller, Director of Community Lending and Investment; Rachel Degraw, Homebuyer Development Specialist

**III. BUDGET**

The Applicant/Grantee may require a more detailed budget breakdown than the one contained herein, and the Partner shall provide such supplementary budget information in a timely fashion in the form and content prescribed by the Applicant/Grantee. Any amendments to the budget must be approved in writing by both the Applicant/Grantee and the Partner

**Total Budget: \$21,722,033**

1. Lending Services and Supportive Services:

Manufactured Home Replacement Grants/Loans:

- Total Budget Allocation: \$21,722,033
- Number of Home Replacements: 70
- Breakdown:
  - Direct Labor: \$477,130
  - Fringe Benefits: \$48,996
  - Travel: \$99,841
  - Contracts: \$430,560
  - Construction Costs: \$17,832,197
  - Indirect Costs: \$2,833,309

**IV. SEVERABILITY**

If any provision of this Agreement is held invalid, the remainder of the Agreement shall not be affected thereby and all other parts of this Agreement shall nevertheless be in full force and effect.

**V. SECTION HEADINGS AND SUBHEADINGS**

The section headings and subheadings contained in this Agreement are included for convenience only and shall not limit or otherwise affect the terms of this Agreement.

**VI. WAIVER**

The Applicant's failure to act with respect to a breach by the Partner does not waive its right to act with respect to subsequent or similar breaches. The failure of the Applicant to exercise or enforce any right or provision shall not constitute a waiver of such right or provision.

**VII. ENTIRE AGREEMENT**

This Agreement between the Partner and the Applicant for the use of CDBG-PRICE funds, supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between the Partner and the Applicant/Grantee with respect to this Agreement. By way of signing this agreement, the Partner is bound to perform the agreements within this agreement or any HUD approved amendment thereof. Any amendment to this agreement must receive prior approval by HUD.



Date: 6/3/2024

IN WITNESS WHEREOF, the Parties have executed this contract as of the date first written above.

Lincoln Institute of Land Policy

Neighborhood Partnership Housing Services, Inc.

DocuSign by:  
By George W. "Mac" McCarthy  
George W. McCarthy  
President and CEO

By   
Clemente Mojica  
President and CEO

May 20, 2024

Mr. Gray  
Lincoln Institute of Land Policy  
1630 Underwood St., NW  
Washington, DC 20012



Re: Intent to Participate

Dear Mr. Gray,

This letter is to confirm the mutual intent of both the Lincoln Institute of Land Policy (Lincoln) and Abt Associates (Abt) to collaborate and enter into a contractual agreement, contingent upon the award of funds from the United States Department of Housing and Urban Development (HUD) for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in Lincoln's CDBG-PRICE application.

Abt is a mission-driven consulting firm focused on improving the quality of life and economic well-being of people around the world. Abt has decades of experience providing technical assistance to HUD-funded program grantees and conducting program evaluations. Abt is both experienced in providing technical assistance on a number of federal programs and conducting program evaluations using qualitative, quantitative, and mixed methods to better understand program outcomes and the processes used to generate them.

As a contractor to Lincoln, Abt will provide technical assistance and training to Lincoln and their contractors throughout the six-year life cycle of the PRICE award with a focus on federal regulations, CDBG program requirements, and other cross-cutting federal requirements. In addition, Abt will provide technical assistance to subrecipient agencies and partners of Lincoln participating in the PRICE grant, including affordable or non-profit developers, community land trusts or other subrecipient entities to build their capacity to carry out compliant projects that meet federal requirements.

Abt will also conduct a process study, outcomes analysis, and analysis of homeowner experience for Lincoln's PRICE program to understand the barriers, challenges, and successes of the PRICE sub-grants and understand if the program is creating equitable outcomes and is successful in reaching underserved groups. The process study will also seek to understand the changes in homeowners' housing quality and stability and asset-building potential due to mobile home replacement and understand the homeowners' experiences in obtaining financing through the PRICE program.

It is understood that this letter is only an expression of our intent and a binding contract detailing the terms and conditions of the proposed contractual relationship must be executed before the use of any CDBG-PRICE funds, if awarded.

Sincerely,

A handwritten signature in black ink that reads "Michelle Wood". The signature is written in a cursive, flowing style.

Michelle Wood  
Client Account Lead, Housing and Asset Building



June 10, 2024

George W. McCarthy, CEO  
Lincoln Institute of Land Policy  
113 Brattle Street  
Cambridge, MA 02138

Re: Intent to Participate

This letter is to confirm the mutual intent of both the Lincoln Institute of Land Policy (Lincoln) and NeighborWorks America to collaborate and enter into a partner agreement, contingent upon the award of funds from the United States Department of Housing and Urban Development (HUD) for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in Lincoln's CDBG-PRICE application.

NeighborWorks America is a national nonprofit founded by Congress to create opportunities for people to live in affordable homes, improve their lives and strengthen their communities. With a network of nearly 250 member organizations, NeighborWorks provides a broad range of resources, including funding, training, technical assistance and peer learning, to support the affordable housing and community development field. As part of our focus on advancing affordable housing, NeighborWorks has supported the development of manufactured housing in rural, suburban and urban communities across the country for nearly 25 years. Along with other nonprofit partners, including Lincoln and Next Step, we have promoted manufactured housing as a safe, modern and affordable solution to the nation's housing crisis. Our network includes some of the leading nonprofit manufactured housing developers, including the three organizations (Fahe, Come Dream, Come Build (cdcb) and Neighborhood Partnership Housing Services (NPHS)) that will carry out lending and replacement activities under Lincoln's proposal.

NeighborWorks America will serve as a support contractor to Lincoln. Proposed duties include, but are not limited to the following:

*Amplification of Replacement Program*

NeighborWorks proposes to develop case studies which describe and document learnings from the organizations implementing Lincoln's proposed replacement approach. These case studies will highlight program success, document best practices and highlight model elements using both quantitative data and narrative storytelling. The case studies will feature lessons learned across multiple facets of the replacement program, including construction, counseling, and climate



resilience. Upon completion of the case studies, NeighborWorks will explore opportunities to integrate the products into our training curriculum for broad dissemination within the housing and community development field.

*Dissemination of Learnings*

Upon the completion of the case studies, NeighborWorks will disseminate these resources across the NeighborWorks network and I'm HOME membership. NeighborWorks will encourage organizations to test the models and learnings highlighted in the case studies to support potential replication in different geographies across the country.

As a final activity, NeighborWorks proposes to host a capstone event at a NeighborWorks Training Institute (NTI), or similar venue, which would disseminate learnings among key members of the NeighborWorks and I'm HOME network. NeighborWorks will provide scholarships to support participation in the capstone event and related training content that highlights promising approaches for manufactured housing repair and replacement.

It is understood that this letter is only an expression of our intent and a binding partner agreement detailing the terms and conditions of the proposed partnership must be executed before the use of any CDBG-PRICE funds, if awarded. Thank you for the opportunity to partner with Lincoln. We are looking forward to the tangible outcomes this proposed program design will achieve in communities across the country.

A handwritten signature in black ink, appearing to read "S. Ifill".

Susan M. Ifill  
Executive Vice President and Chief Operating Officer  
NeighborWorks America



1287 Royal Ave  
Louisville, KY 40204  
(502) 694-1976  
[info@nextstepus.org](mailto:info@nextstepus.org)

George W. McCarthy, CEO  
Lincoln Institute of Land Policy  
113 Brattle Street  
Cambridge, MA 02138

Re: Next Step Network, Inc. Intent to Participate

This letter is to confirm the mutual intent of both the Lincoln Institute of Land Policy (Lincoln) and Next Step Network, Inc. to collaborate and enter into a partner agreement, contingent upon the award of funds from the United States Department of Housing and Urban Development (HUD) for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in Lincoln's CDBG-PRICE application.

Next Step's mission is to put sustainable homeownership within reach of everyone while transforming the manufactured housing industry through consumer education, affordability and energy efficiency. Next Step has delivered its system of Manufactured Housing Done Right® for over a decade. We have also successfully provided technical support to other housing providers to help families buy better homes with better loans. Next Step is a national leader in the manufactured housing sector, and our team has over 50 years of combined experience in the field. Next Step built our "Done Right" reputation by establishing the industry's highest quality, energy-efficiency and climate resiliency standards. We are a technical assistance provider and will provide this support to Lincoln and its partners. Next Step will act as a contractor in our partnership role. We will advise the team on procurement, program design, home design and specifications, climate resiliency and energy efficiency. We will help the team ensure the highest-quality homes by providing training to the developers and subrecipient.

This letter is only an expression of our intent. If awarded, a binding partner agreement detailing the terms and conditions of the proposed partnership must be executed before the use of any CDBG-PRICE funds if awarded.

Next Step Network

Stacey Epperson  
President & CEO  
June 8, 2024