



PROPOSAL FOR PUBLIC COMMENT

Application for Preservation and Reinvestment Initiative for Community Enhancement (PRICE)

June 13, 2024

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Exhibit A: Executive Summary

Addressing the numerous challenges faced by rural communities requires a comprehensive and multifaceted approach. For over five decades, the Housing Assistance Council (HAC) has been at the forefront of this effort. Since its establishment in 1971, HAC has been providing direct technical assistance and offering low-cost capital to thousands of small towns and communities across the nation. In addition to this direct support, HAC has also played a pivotal role in analyzing rural housing markets and disseminating crucial information on rural housing conditions. This invaluable data has informed federal housing policy and guided decision-making processes. The impact of HAC's work is evident in countless rural places, where the organization's support has empowered local housing organizations and facilitated positive change. Through collaboration with these organizations, HAC has facilitated the implementation of effective strategies, resulting in improved housing conditions and enhanced community development planning.

Manufactured housing is an especially important housing resource in rural America. Of the approximately 6.5 million occupied manufactured homes in the United States, nearly 45 percent, or 2.9 million, are located in HAC's national multi-site proposed service area. Manufactured homes make up 12.6 percent of all occupied homes in our proposed service area – twice the rate for manufactured homes nationally.

HAC is uniquely qualified to address the challenges faced by rural manufactured home residents and communities. Founded in 1971, HAC is a certified CDFI that provides low-cost loans for affordable housing projects, technical assistance, and research services to developers in rural communities. We have originated over \$465 million in low-cost loans for 65,000 rural homes, including manufactured housing. HAC offers technical assistance to emerging developers and has provided many for-profit and nonprofit developers with their first loans.

We request a \$75 million PRICE Main award to provide long-term stability, equity, and affordability for manufactured home residents specifically in rural America. The Rural Stabilization, Equity, and Affordability for Manufactured housing (RuralSEAM) program will achieve this through three key activities – technical assistance, grants and low-rate loans, and land tenure/heirs' property assistance.

HAC seeks to leverage awarded PRICE funding to support residents of manufactured housing communities in rural areas by offering technical assistance and training to nonprofits and public entities on preserving and improving manufactured housing communities, and by grant funding and low-interest financing for land and community acquisition and infrastructure improvements (including climate mitigation improvements). Additionally, HAC proposes to provide research and support to assist owners in resolving challenges related to heirs' property or tangled ownership issues. As part of the RuralSEAM programming, HAC will collaborate with legal service providers to aid manufactured homeowners in clearing their titles in cases of heirs' property. Our partners in this work will include nonprofit organizations and public housing authorities and other public entities that own manufactured home communities or scattered site properties, or are interested in acquiring or developing manufactured home communities.

A HAC board member regularly says, "Money flows like water – where it is easiest." HAC has found that it is definitely more difficult to deploy federal funds in rural communities; money does not flow like water to rural communities, especially without intentionality and technical assistance. These are what HAC uniquely brings to PRICE. We work every day to build the



capacity of rural nonprofits and communities to be in a place where they can access funds to improve their housing and communities. Rural places are typically not entitlement communities for CDBG and other federal funds, and local rural nonprofits are often small. They have fewer staff and less capacity to apply for and manage federal funds. HAC's role is to fill those capacity gaps and make sure that innovative, once-in-a-lifetime programs like PRICE can be effectively used in rural America.



Exhibit B: Threshold Requirements and Other Submission Requirements

Applicant: Housing Assistance Council

Main Point of Contact: Shonterria Charleston, Director, Training and Technical Assistance

Address: 1828 L Street, NW Suite 505, Washington, DC 20036

Contact Information: terria@ruralhome.org; 202-842-8600.

Outstanding Civil Rights Matters: None

Timely Submission of Application: HAC is submitting the application before the deadline.

Type of Applicant: Nonprofit 501(c)(3) Entity

Number of Applications: One (1)

Application Category: PRICE Main Program

Public Hearing: June 26, 2024, 12:00 PM ET; 1828 L Street, NW, Suite 505, Washington, DC 20036, and accessible online via Microsoft Teams. Announced in HAC's newsletter and social media on June 6, 2024, and by email blast on June 11, 2024.

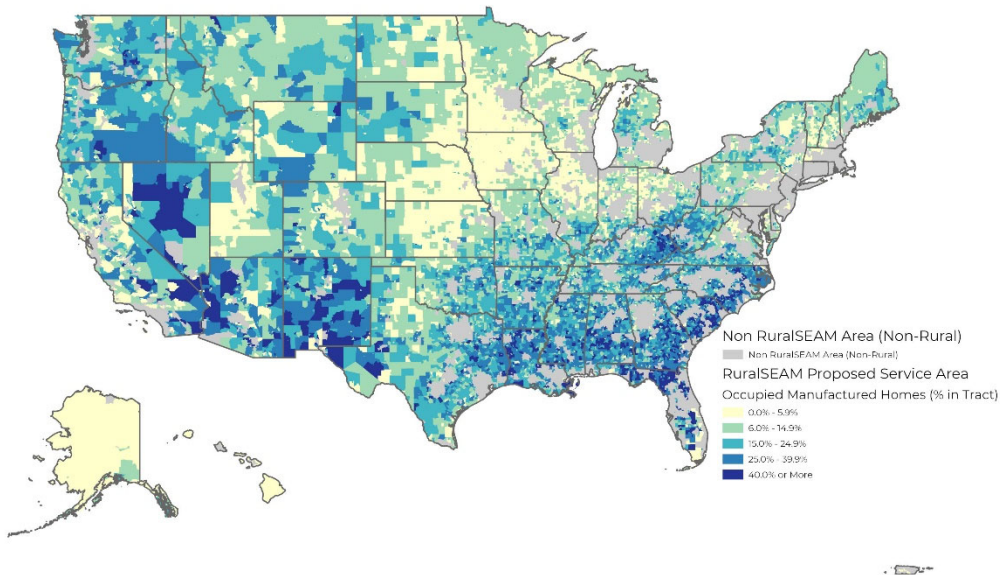


Exhibit C: Need

Under the PRICE Main program, HAC proposes to provide Rural Stabilization, Equity, and Affordability for Manufactured housing (RuralSEAM) assistance and services exclusively in rural areas (census tracts) of the United States as identified by the Federal Housing Finance Agency's Duty to Serve program.¹

HAC's RuralSEAM Service Area

Manufactured Homes in FHFA Designated Rural Census Tracts



Source: Housing Assistance Council Tabulations of data from the U.S. Census Bureau's 2018-2022 American Community Survey and the Federal Housing Finance Agency (FHFA).

Manufactured housing is an especially important housing resource in rural America. Of the approximately 6.5 million occupied manufactured homes in the United States, nearly 45 percent, or 2.9 million, of these homes are located in HAC's national multi-site proposed service area. According to HAC tabulations of the U.S. Census Bureau's 2018-2022 American Community Survey data, manufactured homes make up 12.6 percent of all occupied homes in our proposed national rural service area – twice the rate for manufactured homes nationally.

Manufactured housing is unique with respect to important residential features such as siting, placement, and location. An important element of HAC's proposal is its recognition of and responsiveness to unique community dynamics and location for manufactured home stabilization and equity, especially for rural markets across a large geography. Placement in a manufactured home community is one important characteristic of manufactured homes in the United States. But most manufactured homes in the U.S. are located on scattered site lots and parcels. This is particularly true for rural areas. Cognizant of these rural realities of manufactured home dynamics, HAC's stabilization efforts will serve a wide spectrum of manufactured home placement settings ranging from land-lease communities to nonprofit owned parks, individual manufactured homeowners, and renters on scattered site parcels.

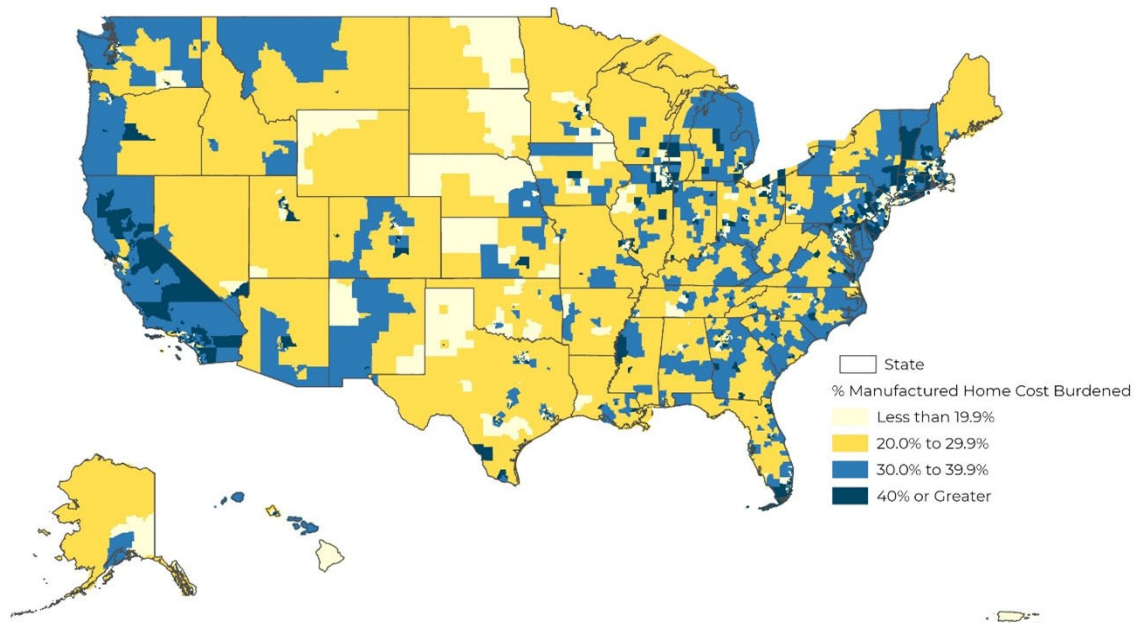
Housing Challenges

Housing Costs

A significant element of manufactured homes' evolution and popularity in the U.S. housing market has been their relative cost affordability and convenience. Housing affordability is now by far the largest housing concern in the nation, and the manufactured housing market has not been spared in recent years. Additionally, while manufactured homes typically have lower nominal costs, there are "hidden" costs that often mask affordability concerns for manufactured home residents.

Over 5.6 million – or one quarter of all rural households – pay more than 30 percent of their monthly income toward housing costs and are considered cost-burdened. The incidence of housing cost burden has increased markedly for rural households over the past few decades. Cost-burden rates are even higher in rural census tracts where the majority of the population is Black or Hispanic. According to HAC tabulations of 2017-2021 American Community Survey data, in Black-majority rural census tracts, 55 percent of households pay more than 30 percent of income for housing, as do 47 percent in Hispanic-majority tracts.

Cost Burdened Manufactured Homes, 2019



Source: Housing Assistance Council Tabulations of the U.S. Census Bureau's PUMS 2015-2019 American Community Survey Five Year Estimates.

According to HAC analysis of the Census Bureau's 2019 American Community Survey Public Use Microdata Sample (PUMS) data, over 1.9 million or 30 percent of manufactured home resident households in the United States are housing cost burdened.²

While housing costs are comparatively lower in some rural areas than in many cities and suburbs, rural incomes are frequently also low and stagnant, leaving many residents unable to afford housing. As an example, the rate of unaffordable housing in rural persistent poverty



counties is at 39 percent – nine percentage points higher than for all rural areas.³ When people are forced to use more of their funds for housing costs, they invariably have less money to put towards other necessary expenditures. This constrained spending is a further drag on rural household and community economics.

High-Cost Lending

Quality credit and affordable mortgage sources are often more difficult to obtain in rural areas of the U.S. than in cities or suburbs. The smaller size and remoteness of many rural communities can raise costs for consumers due to less competition among lenders. In addition, subprime and high-cost loans continue to significantly influence rural mortgage markets. In 2022, nearly 10 percent of rural mortgage originations were considered to have high-cost terms, compared to 6.6 percent nationally, and lenders originated more than 105,000 high-cost loans in rural areas.⁴ Generally, the rate of high-cost lending has been higher in rural areas than suburban and urban areas for more than a decade.⁵

High interest rate lending is even more acute for rural manufactured home loans and products. Most manufactured homes are still financed with personal property or “chattel” loans.⁶ Personal property loans are more like automobile loans than conventional mortgage loans and have their roots in manufactured homes’ growth out of the travel trailer industry. With shorter terms and higher interest rates, personal property loans are generally less beneficial for consumers than conventional mortgage financing.

Approximately 66 percent of rural manufactured home loans in 2022 were classified as high-cost, which is more than five times the level of high-cost lending for all homes nationally. And for manufactured home loans secured by the manufactured home only (without land), that figure jumps to a staggering 90 percent high-cost loan rate.⁷ A core element of HAC’s RuralSEAM program is to provide rural community-based organizations and manufactured home residents with the abilities, resources, and direct assistance to gain more control and agency over the land on which their manufactured homes sit.

RuralSEAM targets key challenges in rural underserved and minority communities, including the extremely high proportion of high interest rate manufactured home loans among rural residents of color. According to HAC tabulations of Home Mortgage Disclosure Act data, over 90 percent of rural Black manufactured home borrowers received “high cost” loans in 2020. High-cost lending for manufactured homes was also extremely common for rural borrowers of two or more races (80 percent), rural Native Americans (75 percent), and rural Hispanics (69 percent) – all generally more than four to five times higher than high-cost lending rates for conventional site-built homes.

Price Increases

Rural manufactured homes have been impacted by the recent national slowdown in homebuying and mortgage activity related to interest rate increases and by the cost increases, supply chain delays, and material and labor shortages that have impacted the broader housing market in recent years. The average sales price of a new manufactured home (excluding land) in January 2020 was \$86,400. As of January 2024, the average had risen to approximately \$120,000 – an increase of nearly 40 percent in a four-year period.⁸



Older and Substandard Manufactured Homes

Today's modern manufactured homes are comparable in quality and safety to conventionally constructed single-family homes. It is also important, however, to recognize the existing stock of older manufactured or "mobile" homes in rural communities. According to HAC tabulations of 2022 American Community Survey data, approximately 670,000, or one-fifth of currently occupied manufactured homes in HAC's proposed RuralSEAM service area, were built before 1980. These older units are likely to be smaller, less safe, and have fewer amenities and less investment potential than newer manufactured homes. (As required, no RuralSEAM funds will assist pre-1976 mobile homes.)

While housing affordability problems are on the rise, it is often presumed that substandard and dilapidated homes have largely vanished from the American landscape. Indeed, efforts to improve housing conditions have resulted in dramatic gains so that most U.S. households currently live in high quality, safe, and decent homes. Even so, estimates from HUD's American Housing Survey (AHS) indicate that approximately 5.6 percent of homes in rural areas are classified as inadequate.^{9,10} Among manufactured homes nationally, the AHS estimates over 590,000 or 8.8 percent of manufactured homes are moderately or severely inadequate. Among manufactured homes built before 1980, the rate of inadequate homes increases to 14 percent.¹¹

While inadequate homes are present across the nation, a large portion of these substandard homes are in persistently poor rural communities such as Central Appalachia, the Lower Mississippi Delta and the rural Southeast, the colonias region along the U.S.-Mexico border, and among migrant and seasonal farmworkers. In some rural communities, especially on Native American lands, the incidence of homes lacking basic plumbing can exceed 20 times the national rate.

Meeting the Needs of Distressed Communities

Significant portions of the geographic area that HAC will reach through RuralSEAM meet one or more of the Distress Criteria as defined by 12 CFR 1805.201(b)(3)(ii)(D). Overall, 19 percent of U.S. residents live in rural areas, which are generally economically worse off than the rest of the country and experience the deepest and most persistent poverty due to stagnating incomes, job loss, outmigration, housing shortages, and historic patterns of discrimination and disinvestment. The median household income in the United States in 2021 was \$70,784,¹² while the rural median household income was below \$59,000.¹³ The median household income of owner-occupied manufactured homes was even lower at \$39,700, compared to \$82,672 for owners residing in single-family homes.¹⁴

Low-income rural families often experience difficulty in increasing their incomes, given limited economic opportunities in many rural communities. ACS data show that in 2022, the rural poverty rate was 15.9 percent, 3.2 percentage points higher than the national average (12.7 percent). Rural communities are nearly four times more likely than urban areas to have at least 20 percent of their population living in poverty. In addition, while rural counties account for just 65 percent of all counties, they comprise 85 percent of those with persistent poverty, defined as having a poverty rate above 20 percent during the past 30 years. Fully 25 percent of RuralSEAM census tracts are persistently poor, and the estimated 1,083,447 manufactured homes in these tracts make up 17 percent of the housing stock there.



The ACS 2022 five-year average unemployment rate in rural America was the same as the national rate of 5.3 percent. The labor participation rate in rural counties (57.2 percent), however, was much lower than the U.S. rate (63.4 percent) because many rural residents have simply stopped looking for work due to the lack of opportunities. If the labor participation rate had been as high as the U.S. average, HAC calculates that the unemployment rate for rural counties would have been 14.5 percent. The unemployment rate in 21 percent of RuralSEAM census tracts is at least 1.5 times the national average rate. An estimated 891,220 manufactured homes make up 16 percent of the rural housing stock in these high unemployment rural census tracts.

Increasing Resilience in Disaster-Prone Areas

RuralSEAM will increase resilience in disaster-prone areas. Under RuralSEAM, HAC will provide grants and low-rate loans to nonprofits and public agencies for a variety of uses including infrastructure and site improvements of manufactured housing communities (MHCs). HAC will complete a resilience assessment of each project funded and will require that disaster resilience strategies be incorporated in their communities. For example, the funding can be used to install climate resilient landscaping to reduce the impact of flooding or to improve or install stormwater retention. The assessment process will look at the potential disasters of the particular region the community is located in – hurricanes, flooding, fires, tornados, extreme heat, etc. – and ensure that the risks of the particular region are factored into infrastructure improvements.

FEMA identifies 235 (1.3 percent) of rural census tracts as Community Disaster Resilience Zones. In these tracts there are an estimated 60,702 manufactured homes, making up 14 percent of the rural housing stock.

Barriers To Manufactured Housing Preservation or Revitalization in Rural America

The homeownership rate for manufactured housing residents is 72 percent, a full 8 percentage points higher than households living in all structure types nationally. At the same time, many owners of manufactured homes do not reap the full investment value or benefits of homeownership often afforded other homeowners due to structural and asymmetric systems inherent to this type of housing. HAC’s RuralSEAM addresses the primary barriers to housing stabilization identified below. The activities in our program will not only improve the rate of homeownership in the United States, but also allow residents of manufactured homes to more fully achieve the economic benefits of homeownership.

Captive Consumers

Land tenure status is a unique characteristic for many manufactured homes that likely contributes to cost, affordability, and stability pressures. While most manufactured homes are located on land owned by the homeowners, an estimated 3 million households pay lot rent in leased-land manufactured home communities¹⁵ where residents own their unit but pay rent to a landlord for the lot on which it is located. Roughly three-quarters of manufactured homes are owner-occupied, and approximately 40 percent of all manufactured homes are sited in land lease communities.¹⁶

HAC estimates that 21,860 or 53 percent of U.S. manufactured home communities are located in the proposed RuralSEAM service area.¹⁷ Over 80 percent of these rural parks are classified as “small” with fewer than 50 manufactured homes.

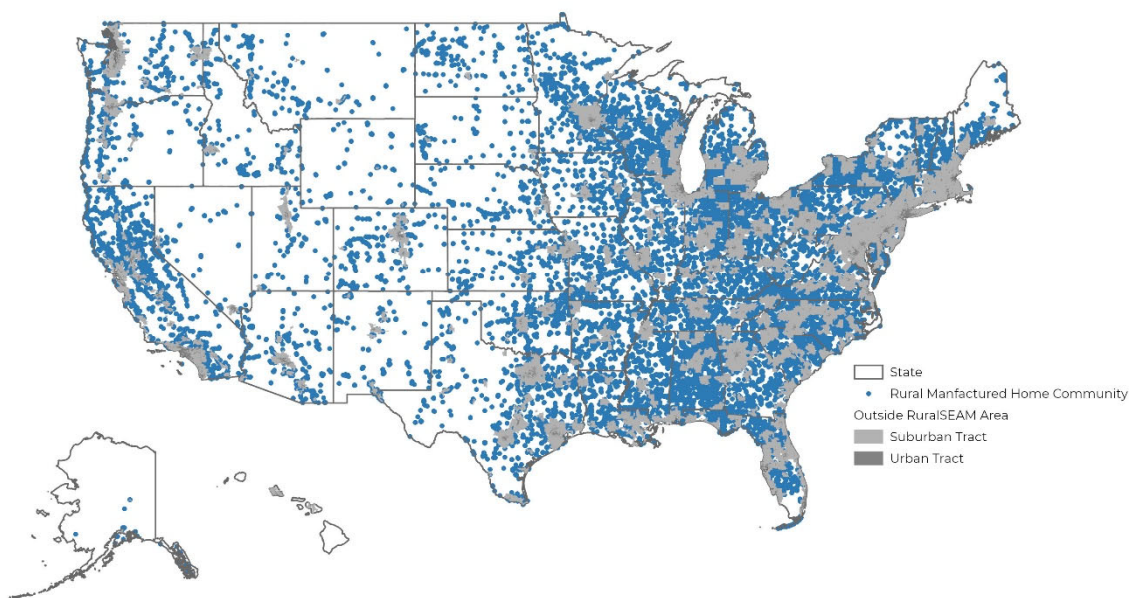
Lot rent costs often represent a substantial expense to homeowners. The average lot rent for manufactured homeowners in 2021 was \$425 per month, and lot rents, like most rents, have been



increasing in recent years.¹⁸ HAC calculates that the median lot rent in manufactured home communities increased by roughly 40 percent between 2011 and 2021.

Additionally, owners who rent their lots are subject to sudden changes that may place them in economic crisis. These issues include rapid land rent increases, creating an excessive cost burden on households with few options due to the prohibitive costs to move their manufactured home to another community.¹⁹ Exacerbating these barriers are weak legal protections for tenants. The combination of these factors leaves residents in the position of “captive consumers.”

Manufactured Home Communities in HAC's RuralSEAM Service Area, 2023



Source: Housing Assistance Council Tabulations of FEMA data

Private Equity Investment

In addition to the longstanding challenges and barriers for rural manufactured home residents, newer issues have also arisen, such as the emergence of private equity investment in manufactured housing communities. These investments can be among the most profitable in the already hot real estate sector, but they often come at the expense of residents in the communities being purchased. Private equity investors purchase manufactured housing communities and profit by increasing lot rents for residents, often significantly.²⁰ While the magnitude of private equity acquisitions is largely unknown, these practices can lead to reduced affordability, eviction, or displacement for manufactured home residents.

Federal Housing Resources

Most manufactured homes are “naturally occurring affordable housing,” almost always unassisted by any federal, state, or local affordable housing programs. The ability to access and better coordinate federal or public housing assistance through RuralSEAM financing and technical assistance activities will provide increased access to substantial federal housing resources that will increase affordability, stability, and equity in this type of housing. Though not well known, some existing federal programs do offer financing options and cost assistance for manufactured homes. HUD’s Housing Choice Voucher (HCV) program can be used in several ways with respect to manufactured housing, including regular rental assistance, homeownership voucher assistance, and Housing Assistance Payments (HAPs) for manufactured space home rental assistance.²¹ Funding from HUD’s HOME and Community Development Block Grant (CDBG) programs can be used for various manufactured housing purposes, including for both rental and homeownership, and CDBG Disaster Recovery is used to support efforts that include manufactured housing.

Barriers to Affirmatively Furthering Fair Housing

The Geography of Race

Race and ethnicity are central and often complex components of our national identity, history, and struggles. Racial dynamics often manifest themselves differently in rural geographies and communities. Geographic clustering of racial and ethnic groups in large regions is one of these unique demographic patterns in rural America. For example, over 85 percent of Black rural residents live in the Southern United States. Black residents comprise an even larger portion of the population in the southern “Black Belt” communities of Alabama, Georgia, Mississippi, North Carolina, South Carolina, and Virginia, as well as the Lower Mississippi Delta states of Arkansas, Mississippi, and Louisiana. Large numbers of rural Native Americans reside on or near Native American reservations and trust lands in the Midwest plains, the Southwest, and Alaska. Nearly half of all rural Hispanics reside in the four states of Texas, California, New Mexico, and Arizona. Over one-fifth of all rural Hispanics live in Texas alone.

Across the country, rural communities with large nonwhite populations often experience worse social and economic conditions than white non-Hispanic communities. Racial and ethnic minority populations and communities have historically and systemically been excluded from pathways to adequate housing. Racial discrimination results in substandard and inaccessible housing that perpetuates economic distress in many racial-ethnic minority communities. Geographic isolation and relative segregation continue to be important components of poverty and substandard housing in many rural communities.

Manufactured housing is also an important source of housing for many nonwhite households, especially in rural communities. More than 1.9 million nonwhite households live in manufactured homes nationally and the rate of rural nonwhite and Hispanic households living in manufactured housing is twice the rate for these groups nationally.²²

A higher proportion of low-paying jobs in rural areas, combined with older populations and lower educational attainment levels, are substantial factors in the rural income gap. The median household income in the United States in 2021 was \$70,784,²³ while the rural median household income was below \$59,000.²⁴ The median household income of owner-occupied manufactured homes was even lower at \$39,700, compared to \$82,672 for owners residing in single-family



homes.²⁵ These lagging income dynamics are even more acute for households of color in HAC's proposed target area. One-third of rural nonwhite and Hispanic households have incomes below \$25,000 annually compared to 20 percent of white non-Hispanic households. Forty-one percent of rural Black households make less than \$25,000 per year, twice the level of rural white households.

Poverty Rates

As these low incomes indicate, poverty rates for rural Americans of all races and ethnicities exceed those of their suburban and urban counterparts. Nonwhite rural residents, particularly Blacks, Native Americans, and Hispanics, have extremely high poverty rates. The poverty rates for rural Black and Native American populations are 30 and 29 percent respectively. These poverty levels are more than twice as high as the U.S. poverty rate. The poverty rate among rural Hispanics, Native Hawaiian and Pacific Islanders, persons of two or more races, and those who identify as other race, are all 20 percent or higher.

Persistently poor counties are classified as having poverty rates of 20 percent or more for three consecutive decades. Using this metric, in 2020 there were an estimated 455 persistently poor counties in the U.S. and Puerto Rico. One of the consistent features of many persistent poverty counties is their clustering within several large rural geographic regions. Persistent poverty counties make up one-tenth of all U.S. counties or county equivalents, and 15 percent of the U.S. landmass. Approximately 81 percent of persistent poverty counties are located outside metropolitan areas. In rural counties with long-term poverty, manufactured homes make up more than 20 percent of the occupied housing stock, which is three times the national rate.²⁶ As noted above, 25 percent of RuralSEAM census tracts have a poverty rate of 20 percent or more. In these high-poverty rural census tracts an estimated 1,083,447 manufactured homes make up 17 percent of the rural housing stock.

Lack of Property Rights

The transfer of property ownership across generations contributes to generational wealth, but unique land tenure issues such as heirs' property, contracts for deed, and tribal trust lands often complicate homeownership and wealth accumulation.²⁷ It is difficult to estimate the extent of land tenure constraints, but a first-of-its-kind study by HAC estimated that at least 500,000 owners of residential properties do not fully own or have control over the land on which their home is located.²⁸

One of these overlooked land constraints is heirs' property, created when a property owner dies without a will or another form of estate planning. The property is then transferred to heirs in joint ownership, usually called tenancy in common.²⁹ If the title is not legally "cleared," the property continues to pass to increasingly large numbers of heirs through generations. Heirs' property is also created when an owner chooses to leave their property to multiple descendants but, for any of a variety of reasons, the heirs do not complete the formal transfer of title.

A significant number of manufactured housing residents lack clear title to their homes, and others die without wills clarifying who inherits the home. Like other heirs' property owners, these manufactured housing residents are predominantly poor households of color in rural, often persistent poverty, communities who have historically been excluded from equitable access to the legal system governing property or, worse, subject to overt racial discrimination within that system. As a result, they have been unable to unlock the financing and wealth creation potential

of their homes and have simultaneously developed a well-earned mistrust of government policy interventions and the legal process.

Low-income and rural residents face multiple barriers when seeking to resolve title issues. There are approximately four lawyers per 1,000 residents in the United States, but they tend to be concentrated in metropolitan regions. Only 2 percent of lawyers practice in small towns and rural areas.³⁰ Ninety-four percent of low-income rural residents report not receiving any or enough assistance with substantial legal problems.³¹ The general lack of access to legal services for low-income rural residents seeking to clear title does not even consider the limited number of attorneys in the nation with training in heirs' property resolution.

Manufactured homes are often titled as personal property, while site-built homes are classified as real property. Real property includes land, fixed permanent physical structures, and any natural resources on the land.³² Real property, sometimes referred to as real estate, has certain property rights and tax implications, as well as federal and state consumer protections including underwriting, loan term, and closing cost disclosure standards.³³

Personal property is considered property that can be moved from one location to another. Given their origins as travel trailers and mobile homes, manufactured homes are still often considered personal property, like vehicles. Today, 77 percent of all newly purchased manufactured homes are titled as personal property.³⁴

Heirs' property owners face many barriers without a clear title. Often referred to as proof of ownership, clear title is required to access many financial resources for repairs or other common needs, including HUD's CDBG Disaster Recovery program. The inability to access loans and grants for repair and upkeep may result in property loss, loss of generational wealth, abandonment, and community blight. In the event of tax default or foreclosure, personal property is often repossessed and does not have the protection of foreclosure processes offered to real property.³⁵

Heirs' property owners with manufactured homes face additional barriers because, while some states provide pathways to transfer a manufactured home title from personal property to real property, proof of clear ownership is needed in most states to transfer the title. Such a transfer of title can provide several important benefits. By transferring to real property, owners have more opportunities for financing and mortgage products, equitable taxation and tax exemptions, and better options for resale.

The classification of the manufactured home as personal property or real property determines the process of inheritance for the owner's descendants upon their death.³⁶ In the absence of a will, the value of the home affects the title transfer process.³⁷ For example, in some states, if the value of the manufactured home titled as personal property is less than a specified amount, the title can be transferred outside of probate at the Department of Motor Vehicles. If the manufactured home has a higher value or is titled as real estate, then the property must be transferred by completing the state's probate proceedings.³⁸

There are a few options for clients needing financial assistance with legal services, but they are often inaccessible to rural and low-income heirs' property owners. The courts offer a process for low-income petitioners to proceed with to the courts without paying court fees. IFP, *in forma pauperis*, allows petitioners who win the appeal or lawsuit to transfer court costs to the opposing



party.^{39, 40} In title resolution cases, however, there is no adverse party, so IFP is not applicable. Heirs' property owners must pay the court fees to resolve their title issues.

Every state has legal aid firms that provide free legal assistance to qualified clients.⁴¹ If a legal aid firm with an estate planning attorney trained in heirs' property issues services a rural community, even if the rural resident qualifies for free legal services, legal aid does not provide funding to pay court fees or funding to buy the interest and shares of other heirs. In addition, some heirs' property owners in low-income communities may have non-liquid assets such as pensions, which inhibit their qualification for legal aid but do not provide the ready money needed to pay for legal costs.⁴²

Heirs' property owners who do not qualify for legal aid face many costs including mediation, recordation fees, court fees, and attorney fees. Approximately 20 percent of all lawyers perform 50 hours of pro bono services a year.⁴³ Third year law students often perform 211 hours of pro bono legal work. However, rural lawyers have limitations when providing pro bono services including conflicts of interest, capacity, and increased demands for travel. The American Bar Association encourages many strategies to support rural legal needs, but often these strategies require financial support to provide services to rural residents, including cost of legal services for urban or out of town attorneys, travel costs, and capacity.⁴⁴

There are substantial benefits to helping low-income manufactured housing residents to clear title and to transfer their homes from personal property to real property. They will have full agency as homeowners with increased access to essential systems including housing finance. They will be able to access more equitable taxation and financing options and greater protections for their property. Providing financial support for clearing title and transferring the manufactured home title from personal property to real property will preserve and generate wealth for the current owners and future generations.



Exhibit D: Soundness of Approach

Vision and Goals

HAC's vision for its RuralSEAM activities is to improve the long-term stabilization, equity and affordability of housing for manufactured housing residents. We will achieve this by 1) providing technical assistance to nonprofits who own or wish to become owners of manufactured housing communities, 2) providing grants and loans to nonprofits and public entities for the acquisition of manufactured housing communities and infrastructure improvements in those communities and other nonprofit owned communities, and 3) providing funding to legal service providers to assist manufactured housing property owners dealing with land tenure/title issues.

HAC's goals for the RuralSEAM program are the preservation and revitalization of manufactured housing and manufactured housing communities in rural communities across the United States, with a focus on places of high poverty. The revitalization activities will also increase resilience to extreme weather, natural hazards, and disaster events. We plan to use our funds to assist mission-oriented housing organizations (nonprofits and public entities) become owners of at risk manufactured housing communities or address infrastructure needs in communities already owned by mission-oriented housing organizations.

HAC will take a three-pronged approach: 1) provide technical assistance to housing organizations that already own manufactured housing communities or are interested in becoming owners, 2) make grants and loans to nonprofit or public housing organizations for the acquisition of manufactured housing communities or to address the infrastructure needs at communities already owned by them, and 3) provide grants for client legal costs, court fees, and filing fees, and funding to firms and organization to expand services to rural areas to serve rural manufacture home owners with clouded titles (also known as "heirs' property").

Activities

Activity 1: Strengthening Capacity through Technical Assistance and Training in Manufactured Home Community Ownership

HAC will provide specialized Technical Assistance (TA) to nonprofit and public entities that either already own manufactured housing communities or want to purchase manufactured housing communities. HAC's approach to capacity building is responsive to the vital role that technical assistance plays in supporting housing organizations, particularly those in rural communities and organizations that own or are developing manufactured housing communities. Our multi-pronged approach includes one-on-one and group learning opportunities, coaching, peer engagement, and strategic partnership development, all aimed at empowering rural nonprofit developers so that they successful as owners and stewards of manufactured housing communities.

Our one-on-one interactions are tailored to the specific needs and challenges of each housing organization and the unique needs of their communities. Our team of experts provides personalized coaching and guidance on a range of topics, including property management best practices, capital/infrastructure improvement planning and implementation, regulatory compliance, financial management, and resident engagement strategies. By taking a hands-on approach, we ensure that housing organizations receive the individualized support they need to succeed.



At the same time, group learning opportunities offer a platform for housing organizations to come together, share experiences, and learn from one another. Through workshops, peer learning circles, and community forums, organizations will receive an opportunity to exchange ideas, troubleshoot common issues, and collaborate on solutions. This approach fosters a sense of community and solidarity among housing organizations, strengthening their collective capacity to address shared challenges.

Peer-to-peer engagement is another key component of our approach. By facilitating peer-to-peer learning and mentorship, we empower housing organizations to tap into the knowledge and expertise of their peers. Whether through formal mentorship programs or informal networking events, organizations have the opportunity to learn from those who have firsthand experience navigating the complexities of manufactured housing community ownership.

Further, HAC's approach recognizes the importance of strategic partnerships in helping organizations achieve their goals. Our team helps with identifying and cultivating strategic partnerships with stakeholders such as local government agencies, other nonprofit housing and service delivery organizations, financial institutions, and industry experts. These partnerships often provide access to resources, funding opportunities, technical expertise, and advocacy support, all of which are critical for the success of housing organizations in the manufactured housing sector.

Our community-led approach to technical assistance emphasizes the importance of tailored support, collaborative learning, peer engagement, and strategic partnership development. By equipping organizations with the knowledge, skills, and resources they need to thrive, we empower them to serve as effective stewards of manufactured housing communities and champions for affordable, sustainable housing solutions.

Activity 2: Low-Cost Financing and Loans for Land Acquisition, MHC Acquisition, and Infrastructure Improvements to Existing MHCs

HAC will provide grants and loans to nonprofit and public entities that already own manufactured housing communities or want to purchase or develop manufactured housing communities. The grants and loans can be used for the acquisition of the land and any existing homes that are not occupied by homeowners. The grants and loans can also be used for community infrastructure improvements.

The grants and loans made by HAC will allow mission-first organizations to compete effectively to purchase manufactured housing communities at risk of being purchased by profit-first organizations that are much more likely to undertake practices designed to displace the existing homeowners from the property. Tactics frequently seen are increasing lot rents to unaffordable levels forcing the homeowners to move, allowing infrastructure to deteriorate until the property becomes uninhabitable, or closing the community and evicting the tenants to convert the property to another more profitable use.

Within four months of executing a PRICE grant agreement, HAC will issue an initial request for proposals (RFP) for grants and loans for acquisition and infrastructure funding. This RFP will be marketed widely through HAC's website and email lists. HAC will also conduct targeted outreach to our extensive network of existing borrowers and technical assistance clients, to the NeighborWorks America membership through a partnership with NeighborWorks, to rural members of the National Association of Housing and Redevelopment Officials (NAHRO), and



to organizations that are part of the National Community Stabilization Trust’s Homeownership Alliance. HAC will also work with other trade associations representing nonprofit and public affordable housing organizations. The initial awards are expected to be announced within six months of the receipt of RFP responses. Depending on the size of its PRICE award and the initial requests received by HAC, HAC may consider periodic additional funding rounds or accepting applications for grants and loans on a rolling basis until all RuralSEAM funds allocated for grants and loans have been committed.

For comprehensive evaluation, HAC will collect data and information from sources like borrower project status reports, certificates of occupancy, settlement statements, appraisals, income eligibility worksheets, Home Energy Rating System (HERS) certificates, registration and attendance logs, leveraging documentation, on-site monitoring review reports, and borrower financial closeout reports. HAC will collect information as requested by HUD. To improve program performance, HAC will gather and analyze collected information (e.g., stakeholder survey, conference evaluations, workshops, and webinars) and data from HAC’s Rural Data Portal and the U.S. Census Bureau’s American Housing Survey and American Community Survey.

Activity 3: Preservation, Sustainability, and Access to Wealth Creation Through Land Retention (Heirs’ Property) and Title Transfer Assistance for Manufactured Homeowners

HAC will distribute RuralSEAM resources as grants to partner legal assistance and community-based organizations to assist residents of manufactured homes clear heirs’ and/or tangled land titles and convert their property to real estate status.

Estate planning and clearing titles can be costly and require the use of legal professionals. It is estimated that probate lawyer fees average \$200 to \$500 per hour.⁴⁵ Depending on the complexity of the title issues, clearing a title may take many months, and in some cases years, to resolve. RuralSEAM funding to support title resolution for heirs’ property owners, including their legal and court fees, will be transformative for low-income rural residents. For farmers, similar regionally specific programs are being implemented in Alabama.⁴⁶ However, no funding source exists for rural residential heirs’ property owners seeking to resolve their title issues.

Due to generations of systemic harm and mistrust, some households of color are wary of engaging with the legal system.⁴⁷ Thus, it is important to work with professionals trained in the mediation, estate planning, and probate proceedings needed to support heirs’ property owners. Potential partners include state legal aid firms, attorneys in the Heirs’ Property Practitioner Network,⁴⁸ HBCU law schools, and Land Grant University Extension professionals.

After executing a PRICE grant agreement, HAC will publish a request for proposals (RFP) for heirs’ property resolution grants. HAC will publicize the RFP through trusted legal partners, HBCU law school networks, and Land Grant Extension networks, and will highlight the RFP widely through HAC’s website, social media, and listserv. HAC will review applications and announce awards within six months of receiving the proposals.



Timeline of Proposed Activities

Time Frame	Key Tasks
Year 1	
10/1/2024 - 12/31/2024	
1/1/2025 - 3/31/2025	<ul style="list-style-type: none"> • Issue Round 1 RFA for rural mission-first housing providers seeking technical assistance (TA) and selection process • Issue Round 1 RFP for mission-first housing providers seeking financing and selection process • Issue Round 1 RFP for legal service providers and selection process
4/1/2025 - 6/30/2025	<ul style="list-style-type: none"> • Announce selection of Round 1 TA participants • Announce and underwrite Round 1 loans and recoverable grants • Announcement and distribution of Round 1 grant funding for legal service providers
7/1/2025 - 9/30/2025	<ul style="list-style-type: none"> • Continued provision of TA and training • Finalize loan terms and structure
Year 2	
10/1/2025 - 12/31/2025	<ul style="list-style-type: none"> • Continued provision of TA and training • Closing on financing/Construction start
1/1/2026 - 3/31/2026	<ul style="list-style-type: none"> • Outreach/pipeline development for mission-first housing providers
4/1/2026 - 6/30/2026	<ul style="list-style-type: none"> • Continued provision of TA and training
7/1/2026 - 9/30/2026	<ul style="list-style-type: none"> • Continued provision of TA and training • Completion of Round 1 properties
Year 3	
10/1/2026 - 12/31/2026	<ul style="list-style-type: none"> • Issue Round 2 RFA for rural mission-first housing providers seeking technical assistance (TA) and selection process • Issue Round 2 RFP for mission-first housing providers seeking financing and selection process • Grant close-out and reporting for Round 1 legal service providers
1/1/2027 - 3/31/2027	<ul style="list-style-type: none"> • Announce selection of Round 2 TA participants • Announce and underwrite Round 2 loans and recoverable grants • Issue Round 2 RFP for legal service providers and selection process.
4/1/2027 - 6/30/2027	<ul style="list-style-type: none"> • Continued provision of TA and training • Announcement and distribution of Round 2 grant funding to legal service providers
7/1/2027 - 9/30/2027	<ul style="list-style-type: none"> • Continued provision of TA and training • Closing on financing/Construction start
Year 4	
10/1/2027 - 12/31/2027	<ul style="list-style-type: none"> • Continued provision of TA and training • Closing on financing/Construction start

1/1/2028 - 3/31/2028	<ul style="list-style-type: none"> • Outreach/pipeline development for mission-first housing providers
4/1/2028 - 6/30/2028	<ul style="list-style-type: none"> • Continued provision of TA and training
7/1/2028 - 9/30/2028	<ul style="list-style-type: none"> • Continued provision of TA and training • Completion of Round 2 properties
Year 5	
10/1/2028 - 12/31/2028	<ul style="list-style-type: none"> • Issue Round 2 RFA for rural mission-first housing providers seeking technical assistance (TA) and selection process • Issue Round 2 RFP for mission-first housing providers seeking financing and selection process • Grant close-out and reporting for Round 2 legal service providers
1/1/2029 - 3/31/2029	<ul style="list-style-type: none"> • Announce selection of Round 2 TA participants • Announce and underwrite Round 2 loans and recoverable grants • Issue Round 3 RFP for legal service providers and selection process
4/1/2029 - 6/30/2029	<ul style="list-style-type: none"> • Announcement and distribution of Round 3 grant funding for legal service providers
7/1/2029 - 9/30/2029	<ul style="list-style-type: none"> • Continued provision of TA and training • Closing on financing/Construction start
Year 6	
10/1/2029 - 12/31/2029	<ul style="list-style-type: none"> • Continued provision of TA and training
4/1/2030 - 6/30/2030	<ul style="list-style-type: none"> • Continued provision of TA and training
7/1/2030 - 9/30/2030	<ul style="list-style-type: none"> • Continued provision of TA and training • Completion of Round 2 properties • Close out and reporting for Round 3 legal service providers grant recipients

Budget

HAC will use the requested \$75 million to improve the stabilization of housing and equity for manufactured housing residents. We will allocate \$10 million of the award to provide technical assistance to nonprofits who own or wish to become owners of manufactured housing communities. An additional \$51.5 million will be allocated to provide grants and loans to nonprofits and public entities for the acquisition of manufactured housing communities and infrastructure improvements in those communities and other nonprofit owned communities. We will also provide \$6 million in funding to legal service providers to assist manufactured housing property owners dealing with land tenure/title issues. The balance of the award will be used for HAC’s administrative costs in administering the RuralSEAM program.

Item	Amount
Relending/Regranting to Mission-First Housing Organizations	\$51,500,000
Loans to Mission-First Housing Organizations	\$3,000,000



Grants to Legal Service Providers	\$6,000,000
Technical Assistance and Training Consultants and Support	\$4,440,000
Training and Travel Assistance Costs	\$1,000,000
Staff Travel	\$250,000
Other Direct Expenses	\$2,049,981
Staff and Fringe	\$7,536,694
Indirect Expenses	\$2,223,325
Total	\$78,000,000
Sources	Amount
PRICE Fund	\$75,000,000
HAC Loan Capital	\$3,000,000
Total	\$78,000,000

Projected Impacts

HAC’s proposed work through RuralSEAM will address the challenges of housing affordability and quality, lack of housing development capacity, lack of access to capital, and lack of access to equity and wealth creation described above in Exhibit C: Need.

Mission-first housing organizations require technical assistance and training to build their capacity to meet the housing needs of their communities. They are also challenged by a lack of capital. HAC is often the only lender available for rural affordable housing. Market gaps occur because other lenders are unwilling to lend due to Community Reinvestment Act (CRA) limitations, loan size and project scale, limited developer experience and financial strength, and collateral value challenges.

Through technical assistance and recoverable grants and loans, these mission-first housing organizations will have access to the resources needed to create new manufactured home communities or purchase and improve existing communities. Over the six-year period, we anticipate disbursing \$51.5 million in loans and grants. We anticipate investments to range from \$5,000 to \$75,000 per unit/lot, depending on the use of funds. This will result in development, improvement, or preservation of at least 1,000 manufactured housing units. This will provide low-income rural communities with significant sustainable affordable housing solutions. It will also build the capacity of mission-first housing organizations to meet their communities’ affordable housing needs.

The activities conducted to support owners of manufactured homes with unclear titles will allow these owners to tap into the equity of their property and determine the future use of their property. Over the six-year period, we anticipate helping 240 individuals or families with unclear titles. This work will also have the secondary impact of providing support to legal service providers serving under-resourced rural communities.



Affordability

HAC’s proposed activities and use of RuralSEAM funds will ensure affordability for low- and moderate-income households served through our program. Affordability mechanisms will vary by our use of the RuralSEAM funds.

Infrastructure and Housing Financing: When HAC uses RuralSEAM to assist nonprofits to acquire or improve a manufactured housing community (MHC), HAC will have an affordability period of not less than 15 years where rents must remain affordable to low- and moderate-income households. For loans made to nonprofit organizations, HAC will enforce the affordability through the loan agreement and mortgage and restrictive covenant. When HAC provides grants to nonprofit organizations, the affordability period will be enforced with a restrictive covenant that will run with the land, with recapture provisions.

HAC borrowers and grantees will be required to review income information of new lot renters and their manufactured home rent or loan costs for the unit itself to determine that the combined land rent, utilities, and home costs are affordable.

Affordability duration will be based on the use of the funds and size of the award:

Amount of Investment	Loan	Grant
Up to \$5,000 per lot/home	15-year affordability period	20-year affordability period
Over \$5,000 per lot/home but up to \$15,000 per lot/home	20-year affordability period	25-year affordability period
Over \$15,000 per lot/home	25-year affordability period	30-year affordability period

Renters of homesites financed or improved with RuralSEAM funding will pay no more than 30 percent of gross income on housing costs including site rental, fees, and utilities, per HOME requirements. HAC’s primary mechanism to balance affordability with the opportunity to build financial security and wealth for manufactured homeowners is providing low-rate loans and grants for the land. Lower financing costs to the nonprofit landowner will allow them to keep land rents low and thus provide manufactured homeowners with increased financial security.

Technical Assistance: When HAC uses RuralSEAM funds for technical assistance activities, the manufactured home community benefiting from the technical assistance will have a 15-year affordability restriction (a restrictive covenant that will run with the land), limiting new land lessors to low- or moderate-income households, and requiring income and housing cost certification of new residents.

Land Tenure/Heirs’ Property Assistance: When HAC uses RuralSEAM funds to assist a manufactured homeowner to “untangle” the title of the land on which it sits, HAC is proposing to waive long-term affordability requirements to ensure that the manufactured homeowners will be able to build wealth following resolution of title defects. Because these owners did not have clear title to their land, it could not be a source of wealth building for them. Assisting manufactured homeowners clear their heirs’ property issues and tangled title unlocks this value for them.

HAC will require that land tenure/heirs’ property assistance be provided only to low- and moderate-income manufactured homeowners, so only low- and moderate-income households will benefit from this assistance.



Protections for residents: In HAC’s deed restriction, HAC will require that the community adopt or maintain tenant site lease protections consistent with or greater than those required by Fannie Mae or Freddie Mac. HAC will provide a sample lease addendum, but awardees can provide an alternative if it meets these requirements. The lease addendum will include provisions for notices of rent increases, renewable leasing structures, right to purchase or sell, right to sublease, advance notice of planned sale or closure of a community and additional provisions to ensure residents know their rights and are protected from displacement.

Encouraging access to resources and financing, especially for underserved communities and persons: HAC will require accessibility improvements of an MHC site’s infrastructure and homes owned by the community to ensure access to individuals with disabilities and to allow residents to age in place.

Section 3: HAC will employ several strategies (through requirements passed along to recipients and borrowers of RuralSEAM funds) to inform low-income residents of any employment and job training opportunities generated by these investments. HAC will require applicants for RuralSEAM construction investments to identify their Section 3 plan in their applications, and identify strategies to inform low-income residents about opportunities. Recipients will be required to have an outreach plan such as outreach and advertisement through churches, schools, tribes, community colleges, job centers, social service agencies, housing authorities, area employers, social media, direct mailings, flyer distribution, radio and newspaper ads, etc., with information about any available training and employment opportunities for local low-income residents and businesses at the RuralSEAM investment properties. RuralSEAM recipients of infrastructure construction funding will be required to develop a list of employment opportunities, post it at their main office, and pass out copies at or near the site where the development occurs. HAC and its recipients will track the number of jobs that are created using these strategies.

In addition to advertisement of employment and training opportunities, HAC and its RuralSEAM recipients will promote contracting opportunities with local businesses, particularly those that are owned and managed by local Section 3 residents or are certified as Section 3 businesses. HAC will require its recipients of funding for construction activities to utilize the following strategies: (1) all bid requests will include language stating that Section 3 eligible businesses are encouraged to bid; (2) Section 3 businesses will be recruited to bid; (3) bid requests will be made available at local building departments, stores, churches, schools, and other community facilities; and (4) the bidding selection criteria will include additional points for bids made by Section 3 eligible businesses. HAC and its recipients will use Section 3 Project Summary forms to track the businesses that solicit, bid, and are contracted for work.

Equity

As detailed in Exhibit C: Need, poverty rates for rural Americans of all races and ethnicities exceed those of their suburban and urban counterparts and nonwhite rural residents have extremely high poverty rates, some more than twice as high as the U.S. poverty rate.

Economically distressed rural communities need interventions to improve access to capital and address significant housing needs. The private market leaves gaps because of project scale, developer limitations, collateral value challenges, and limited support from banks, CDFIs, and philanthropy. COVID exacerbated the challenges as high construction costs and labor shortages persist.



For residents living in manufactured homes, and particularly those with unclear title to the land, these challenges are even greater.

In all of our work, HAC prioritizes underserved communities and equity. HAC is the only national CDFI dedicated exclusively to serving rural America, where some of the nation's most underserved communities are found. Our approach to lending and technical assistance is essentially an open-door policy – we work with very inexperienced local housing groups that may need extensive assistance but may be their communities' best hope for housing improvements, and over the decades we have watched many of them succeed. We will continue to prioritize equity and affirmatively furthering fair housing with our RuralSEAM program by:

- Requiring that all infrastructure improvements meet ADA requirements, so the community is accessible to households with disabilities;
- Ensuring that at least 5 percent of units owned by the community are fully accessible; and
- Requiring that nonprofit owners of MHCs supported with RuralSEAM funding develop and implement Affirmatively Furthering Fair Housing Marketing Plans.

HAC tracks a number of metrics to evaluate our progress in advancing racial equity and these metrics demonstrate our equity commitment. Last year, 67 percent of the organizations served through HAC's development services, 73 percent of our units supported through our lending, and 76 percent of dollars lent were in high poverty areas. In addition, 25 percent of our loan dollars were invested in persistent poverty counties. In each of the past five years, over 40 percent of HAC's loans were for projects in census tracts in which a majority of people identify as minority (all groups other than white non-Hispanic). Our lending team is intentional about breaking down barriers to access to capital for developers led or controlled by people of color. Of the 134 loans made by HAC over the past five years, 45 percent were to minority-led or controlled organizations.

Request for a waiver for affordability for heirs' property owners seeking to clear their titles

Absent a waiver, a manufactured housing resident that received RuralSEAM assistance to clear title and transfer it from personal to real property would be required to maintain affordability at the HOME Investment Partnership standard for 15 years. While HAC supports the affordability requirement, we respectfully submit that HUD consider a waiver request with respect to the heirs' property activities HAC proposes. If RuralSEAM-supported legal and other assistance unlocks financing and wealth creation (e.g., through sale of the home) opportunities for these households – which have been systematically excluded and/or discriminated against by the legal and housing finance systems, often over the course of generations – fairness requires that they be permitted to fully capitalize on those opportunities. Given their historical experience with government and the legal system, moreover, it is likely that if legal or other assistance comes with long term government restrictions, they will decline it, despite their great need for it to retain their land and build wealth. Thus, this waiver is necessary to preserve manufactured housing and expand wealth building opportunities for the vulnerable and historically discriminated-against low- and moderate-income households who reside there.

Environment and Resilience

As the impacts of climate change increase, vulnerable rural communities face growing challenges. For those living in manufactured homes the challenge is greater. For example, a recent analysis by



Headwater Economics found that manufactured homes are more likely to be located in communities with a high flood risk than other residential properties (one in seven versus one in 10.)⁴⁹ Then too, certain geographic regions are more prone to natural disasters, such as wildfires in the West, tornadoes in the Midwest, and hurricanes in the coastal South.

Complicating the challenges faced by all disaster survivors, rural communities often confront disasters with limited resources, expertise, and capacity. They may have little ability to prepare formally for natural disasters and lack sufficient affordable housing inventory or basic infrastructure to recover. Many rural areas are resilient in spirit and local effort, but focusing on this resilience can overlook the persistent disaster needs of these communities.

Rural areas also have unique economic challenges in the face of disasters. A higher incidence of persistent poverty in rural areas manifests as a higher incidence of manufactured homes, concentrating the problems that come along with them. After a disaster, these homes are more likely to be damaged and not salvageable, putting vulnerable populations at risk.

Heirs' property owners may face barriers when preparing for weather-related hazards and during post-disaster recovery. Clear property titles are required for multiple preparatory recommendations including acquiring property insurance and accessing financing for roof and anchoring system reinforcements for the manufactured home.⁵⁰ Additionally, after a disaster, property owners must submit proof of ownership to access disaster recovery funding. HUD's Community Development Block Grant-Disaster Recovery (CDBG-DR) program currently requires title documentation, which is a barrier for heirs' property owners.^{51, 52} Helping low- and moderate-income manufactured homeowners ensure they have clear documentation to their property is critical to ensuring rural communities can adequately prepare and respond to the impact of disasters.

When HAC RuralSEAM funds are proposed to be used for acquisition or infrastructure improvements at an MHC, HAC will work with the nonprofit to assess resiliency of the property, utilizing FEMA's Resilience Analysis and Planning Tool (RAPT), the Resilient Assessment Tool for CDFIs created by the University of New Hampshire (UNH) Carsey School of Public Policy, and other resiliency assessment tools. The UNH assessment tool assesses a variety of project-specific resiliency factors, assesses vulnerability and risk by looking at historic and potential stresses and shocks (disasters), and can be used to identify options and methods to improve the resilience of the community from potential stresses and shocks.

Based on the results of the resiliency assessment, each project funded with RuralSEAM will develop a scope and plan for resiliency. Specific measures will be based on the particular risks in each community, but likely measures to be considered include:

- Stormwater and floodwater mitigation including adding retention basins, site improvements, and green infrastructure to impede run off and improve natural retention (i.e., vegetated berms, bioswales, rain gardens, permeable paving materials), and improved grading. When needed (such as a site in an existing flood plain), elevation of the site may be raised to improve flood resilience.
- Construction of storm shelters and cooling shelters that can withstand hurricanes and tornadoes and provide relief from extreme heat.
- Use of renewable energy and development of energy resilience, such as addition of solar panels to MHCs, including battery/energy storage to power the community when the larger grid is down, and assessment of potential for renewable energy powered micro-grids.
- Wildfire mitigation strategies such as removing dead vegetation and use of ignition-resistant site improvements.



- Any vertical construction or improvements funded with RuralSEAM (i.e., community buildings and other amenities, manufactured homes owned by the community, fencing, ramps, etc.) will incorporate energy and water efficiency and appliances and eco-friendly, sustainable building materials.

Community Engagement

To actively involve underserved groups in the design, planning, and implementation of our program, HAC will take a multifaceted approach to ensure comprehensive engagement and participation from diverse stakeholders. This includes holding a public hearing on this application and further seeking out implementation input from nonprofits, local government, CDFIs, and ultimately residents of manufactured housing communities.

Partnerships with Grassroots Organizations: We utilize existing strategic partnerships with nonprofit organizations that have established trust within underserved and manufactured housing communities. These organizations will help us understand the unique needs and challenges, ensuring our program is tailored to address challenges specific to their unique geographies, weather and resident needs. Additionally, HAC’s RuralSEAM program will be designed with a clear focus on reducing racial disparities. This includes setting measurable goals and continuously assessing our progress towards achieving tangible reductions in inequities.

Community-Specific Strategies: For each community we propose to support, HAC will implement practices that include regular consultations and feedback sessions with stakeholders such as manufactured housing residents, local governments, nonprofits, CDFIs, cooperatives, tenant advocates, fair housing organizations, manufactured housing developers, builders/general contractors, and coalitions. HAC will organize focus groups, town hall meetings, and workshops to gather input and ensure that the voices of all stakeholders are heard and incorporated into the program’s continued implementation.

Engaging Underserved Communities: To engage and support participation by underserved communities, HAC will employ culturally responsive outreach methods, including multilingual communications and the use of community liaisons (nonprofit partners) who are trusted by local residents. We will also provide virtual and written opportunities to provide input as well as structuring virtual meeting times that vary across regions to reduce barriers to involvement.

Addressing Barriers to Participation: HAC will establish a “RuralSEAM Program Implementation” work group comprised of community leaders and stakeholders to identify and develop solutions for all identified barriers. This may involve policy support or creating new support structures to facilitate participation.

Alignment with Existing Plans and Policies: HAC’s proposal aligns closely with the applicable existing comprehensive plans, land use plans, housing plans, fair housing planning, and other relevant plans or policies in the targeted rural communities. Given the rural nature of our project areas, these communities already largely support manufactured housing as a viable and necessary housing solution. Therefore, our proposal will easily integrate with the current frameworks and will continue to promote the acceptance and development of manufactured housing within these areas.

No Changes to Community Plans and Policies: HAC does not intend to propose changes to community plans and policies to be more supportive of manufactured housing. The targeted rural areas already recognize and support the value of manufactured housing in meeting the housing



needs of their populations. Our focus will be on leveraging and enhancing existing support rather than altering community plans or policies.

Commitment to Local Support. While we are not proposing changes to existing community plans or policies, we are committed to working within these frameworks to ensure our project's success. Our approach includes:

- *Engagement with Local Stakeholders:* Continuing to engage with local officials, community leaders, and residents to ensure our project aligns with their needs and expectations.
- *Collaboration with Local Entities:* Collaborating with local governments, housing authorities, and community organizations to reinforce the support for manufactured housing.
- *Promotion of Best Practices:* Sharing best practices and successful models from other rural areas to enhance the existing support structures for manufactured housing.

Our proposal is designed to align with and support the existing comprehensive plans, land use plans, housing plans, and fair housing planning in the targeted rural communities. By working within the established frameworks and leveraging the existing support for manufactured housing, we aim to deliver effective and sustainable housing solutions without the need for changing current community plans or policies.



Exhibit E: Capacity

Headquartered in Washington, DC, with expert staff positioned in strategic locations in Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Michigan, Minnesota, Missouri, Montana, New Mexico, New York, North Carolina, Ohio, Oklahoma, Virginia, Washington State, and Washington, DC, the Housing Assistance Council (HAC) proudly maintains its mission to support rural communities across America. Leveraging a distinguished 53-year history of impactful service, HAC is dedicated to providing comprehensive development funding support and capacity building services to rural beneficiaries in everything we do. Our diverse team brings to the table a wealth of knowledge and expertise in federal housing programs, housing development, program administration, project financing, financial management, housing services, research, policy implementation and organizational management. HAC is also the leading source of cutting edge research and data analysis on the demography, economy, and housing markets and needs of rural America.

This blend of extensive skills and experiences has propelled HAC to the forefront of rural development, where we have positively impacted the capacity of thousands of rural organizations. Our commitment to rural America has led to investment of over \$465 million in these organizations, facilitating the creation, preservation, and rehabilitation of more than 65,000 affordable homes. Additionally, we have played a crucial role in connecting remote rural areas with vital water, sewer, and other infrastructure services. Beyond the quantitative achievements, our efforts have nurtured some of the most robust rural organizations in the country, demonstrating our unparalleled ability to foster growth, resilience, and sustainability in these communities. With an expansive reach and a deep-seated dedication to improving rural livelihoods, HAC continues to be a dedicated leader in rural affordable housing and capacity building.

Experience Managing and Expending Grant Funds

HAC has a long history of successfully managing and expending grant funds, particularly federal funds through programs such as the HUD Self-Help Homeownership Opportunity Program (SHOP) and the HUD Rural Capacity Building (RCB) program. Our extensive experience ensures that we meet all associated obligations and federal requirements, delivering impactful results for the communities we serve.

For example, HAC has managed SHOP funds totaling millions of dollars over multiple grant cycles. To date, HAC has received 26 cumulative awards totaling \$134,455,343 to facilitate, through affiliates, self-help homeownership housing activities resulting in the construction of new or the rehabilitation of existing self-help units. Funds have been used for land acquisition, site development, and infrastructure improvements such as water, sewer, and road systems. These improvements have facilitated the construction of single-family homes by low-income families using the self-help model, where families contribute significant sweat equity to build their homes.

Experience Meeting Obligations and Federal Requirements

HAC's administration of SHOP and RCB grants exemplifies our capability to meet stringent federal requirements and obligations. HAC adheres to a robust financial management system in compliance with 2 CFR Part 200. This system includes internal controls, detailed accounting procedures, and rigorous financial reporting to ensure funds are used appropriately and efficiently. **For all of its programs**, HAC uses Microsoft Dynamics GP to track and monitor costs



by source, department, and program service. Each SHOP award is assigned a distinct cost center code, facilitating precise tracking of disbursements and repayments. For its RCB awards, HAC meticulously tracks and documents all activities and expenditures. Regular progress reports are submitted to HUD, detailing financial data, milestones achieved, and compliance with federal standards. Through the RCB program, HAC provides capacity-building services to rural housing organizations, enhancing their ability to manage and sustain affordable housing projects.

HAC's successful management and usage of HUD SHOP and RCB grant funds demonstrate our expertise in handling federal grants, meeting associated obligations, and overcoming challenges. Our rigorous financial management systems, compliance procedures, and proactive problem-solving approaches ensure that we deliver impactful and sustainable housing solutions to underserved rural communities.

Key Staff

HAC will utilize a dual-level (Executive and Program) management structure designed to efficiently administer and implement the RuralSEAM program. This approach leverages the extensive experience and expertise within our organization, ensuring alignment with our strategic mission to enhance rural housing and community development.

Executive Level Project Leadership

At the Executive level, led by our President and CEO, David Lipsetz, oversight of service quality and compliance with grant requirements is a priority. This high-level supervision will ensure that our RuralSEAM program aligns with HAC's mission and strategic goals, maintaining our commitment to excellence and accountability.

David Lipsetz, President and Chief Executive Officer (CEO). David Lipsetz helms the Housing Assistance Council as its President and CEO, leveraging his extensive background in federal housing programs and policy development. With a deep expertise in rural housing services, David has significantly contributed to the housing sector through his senior roles at both the U.S. Department of Agriculture (USDA) and the U.S. Department of Housing and Urban Development. His journey in affordable housing management spans notable urban centers, including New York City and Oakland, California. David's academic foundation includes a bachelor's degree from Michigan State University and Master's degrees in Sociology and City and Regional Planning from the Ohio State University, equipping him with a comprehensive understanding of housing and regional development issues. His career began on Capitol Hill, where he served as a legislative aide, laying the groundwork for his future in housing policy.

Other key members of the Executive level management include:

- Eileen Neely, Director of Lending, will oversee financial lending strategies to support rural housing projects;
- Shonterria Charleston, Director of Training and Technical Assistance and Program Sponsor, will guide the strategic direction of our capacity-building services;
- Lance George, Director of Research and Information, will lead our heirs' property work as well as ensuring that our initiatives are data-driven and impactful;
- Jonathan Harwitz, Director of Public Policy, will ensure our program and efforts align with current legislative and policy environments; and
- Simon Peter Kabogoza, Director of Finance and Administration, will manage the fiscal health of our RuralSEAM initiatives.



Eileen Neely, Director, Lending. Eileen Neely brings nearly three decades of housing finance and impact investment experience to her role as Director of Lending at HAC. Her career has seen significant contributions to capital innovation, particularly at Living Cities, where she was instrumental in deploying substantial private capital for housing initiatives. Eileen’s tenure at the District of Columbia Housing Authority and Fresno Housing Authority highlighted her ability to innovate within housing finance, addressing challenges in mortgage lending and development financing. Her work at Fannie Mae in public entity lending activities showcased her commitment to expanding housing opportunities. Eileen’s deep understanding of housing finance mechanisms and her strategic approach to lending continue to enhance HAC’s mission in supporting rural housing development.

Shonterria Charleston, Director, Training and Technical Assistance. Shonterria Charleston directs the Training and Technical Assistance Division at HAC, bringing a wealth of experience from her military and housing backgrounds. Overseeing an array of capacity building programs, including the HUD Rural Capacity Building (RCB) program, Shonterria’s leadership extends to managing critical initiatives like the USDA’s Rural Community Development Initiative (RCDI) and the Citizens Institute on Rural Design (CIRD). Before her current role, she managed HAC’s Affordable Housing for Veterans Program (AHRV) and RCDI programs, providing vital technical assistance on organizational capacity building. Shonterria’s service in the United States Army, combined with her educational credentials from Central Michigan University, Saint Leo University, and the Harvard University Kennedy School of Government, and recent appointment on USDA’s Equity Commission Subcommittee on Rural Community Economic Development (RCED), underpin her commitment to enhancing rural housing. Her HUD HOME Program-Regulations certification and recognition as a HUD Energy Champion are testaments to her dedication and expertise.

Lance George, Director, Research and Information. With more than 25 years of experience, Lance leads HAC’s research efforts. Lance was the principal author of *Moving Home*,⁵³ a seminal research study on manufactured housing in rural communities in 2005. He has authored multiple reports, journal articles, and guides on manufactured housing. In 2022, Lance testified before the U.S. House of Representatives Transportation and Housing Committee on manufactured housing, and also before the U.S. House Committee on Financial Services Subcommittee on Housing, Community Development, and Insurance on “Persistent Poverty in America.” In 2023, Lance testified before the U.S. Senate Committee on Banking, Housing, and Urban Affairs on the State of Housing in the United States. Lance currently serves on a U.S. Department of Energy/ Pacific Northwest National Laboratory Research Advisory Committee for manufactured housing.

Jonathan Harwitz, Director, Public Policy. Jonathan Harwitz brings a distinguished policy background to his role as Director of Public Policy at HAC, with experience spanning housing community development and insurance policy. His prior positions include serving on the House Financial Services Committee and at the Low-Income Investment Fund, where he focused on federal policy and government affairs. Jonathan’s comprehensive policy expertise is further demonstrated through his roles at the U.S. Department of Housing and Urban Development and various positions related to housing and supportive services. A Yale College and Harvard Law School alumnus, Jonathan’s academic achievements provide a solid foundation for his contributions to housing policy and advocacy.



Simon Peter Kabogoza, Director of Finance and Administration. Simon Peter (SP) Kabogoza serves as the Director of Finance and Administration at HAC, where his leadership is pivotal in steering the strategic development and operational execution of the Finance & Administrative department. SP's comprehensive expertise encompasses technical and nonprofit accounting, financial reporting and analysis, and grants management, making him a cornerstone of HAC's financial strategy and management. SP's professional journey is marked by roles that have impacted financial operations and strategy within nonprofit and international organizations. Before joining HAC, he was the Financial Controller at Heartland Alliance in Chicago and served at City Year Inc. as an Interim SVP Controller-Consultant. SP holds a Master of Science in Finance from American University Kogod School of Business and a Bachelor of Science in Accounting from the same institution and is a certified CPA with Wall Street and CFA certifications pending.

Program Level Project Management

The Program Management Team will be the operational backbone of the RuralSEAM project, ensuring day-to-day management and effective implementation of program activities. This team of committed professionals is key to achieving our strategic deliverables and impact targets.

At the forefront of our efforts will be a Senior Project Manager (*Vacant*), who will guide RuralSEAM program strategies towards meaningful outcomes that align with HUD priorities and HAC's mission. The SPM will ensure successful execution of the RuralSEAM project from inception to completion. Their responsibilities will encompass a range of activities that include **(1) Project Initiation and Planning:** *Needs Assessment:* Conduct initial assessments to identify project requirements and objectives. *Stakeholder Engagement:* Engage with key stakeholders, including community members, local governments, and partner organizations, to gather input and ensure alignment with project goals. *Project Planning:* Develop detailed project plans, including scope, timelines, budgets, and resource allocation, ensuring all elements are comprehensively documented. **(2) Project Execution:** *Implementation Oversight:* Lead the implementation of project activities, ensuring adherence to the project plan and timelines. *Team Coordination:* Coordinate and manage project teams, assign tasks, and ensure effective communication and collaboration among team members. *Resource Management:* Oversee the allocation and utilization of resources, ensuring optimal use to achieve project objectives. **(3) Monitoring and Control:** *Performance Tracking:* Monitor project progress through regular status updates, performance metrics, and milestone reviews. *Quality Assurance:* Implement quality control measures to ensure that project outputs meet established standards and objectives. *Risk Management:* Identify potential risks and develop mitigation strategies to address any issues that arise during the project life cycle. **(4) Reporting and Documentation:** *Progress Reports:* Prepare and present regular progress reports to executive leadership, stakeholders, and funding agencies. *Documentation:* Ensure comprehensive documentation of project activities, decisions, and outcomes, maintaining a clear record for future reference and accountability. **(5) Stakeholder Communication:** *Regular Updates:* Facilitate ongoing communication with stakeholders, providing updates on project status, challenges, and successes. *Feedback Integration:* Collection and integration of feedback from stakeholders to continually improve project implementation and outcomes. **(6) Project Closeout:** *Final Evaluation:* Conduct thorough evaluations upon project completion to assess outcomes against objectives and identify lessons learned. *Reporting:* Compile final project reports, summarizing key achievements, challenges, and recommendations for future projects. *Sustainability Planning:* Develop plans to



ensure the sustainability of project impacts, including strategies for continued community engagement and support.

Managing Partner Organizations

HAC has extensive experience managing partner organizations through other programs including HUD’s Self-Help Homeownership Opportunity Program (SHOP). We will use our experience from that program for selection of awardees for RuralSEAM. HAC will select participants that have demonstrated the necessary technical and managerial capabilities for carrying out RuralSEAM projects. In instances where there is limited proficiency, HAC will assign a designed Technical Assistance provider to provide guidance and coaching to the specific organization. In addition, HAC will make classes and educational resources available to all RuralSEAM recipients throughout the project to ensure sustained capacity enrichment. During application review, a competitive process, HAC first evaluates managerial capacity – does the applicant have credentials and experience to implement the proposed RuralSEAM project? HAC assesses leadership commitment, management experience and qualifications, key funding partnerships, project planning and budgeting, lines of responsibility and decision authority, review and reporting infrastructure, and internal controls and procedures in place to comply with program requirements. Second, HAC will evaluate technical capacity – does the awardee or borrower have the necessary skills and technical “know-how” required to successfully complete the proposed RuralSEAM project? HAC reviews resumes/bios of key staff to evaluate their housing development work, communicates with third parties, and considers other grant programs utilized with cross-cutting requirements.

Addressing Staffing, Partner or Skills Gaps. HAC’s staffing level is adequate to handle RuralSEAM program functions and is properly cross trained and well equipped to fill any short-term gaps if a position becomes vacant. If critical gaps occur related to staffing/skills, HAC will promptly notify HUD, and provide a plan and timeframe to resolve the deficiency.

Experience Promoting Racial Equity: HAC’s Commitment and Experience

Promoting racial equity is integral to HAC’s mission and operations. Our extensive experience working directly with underserved communities, particularly Black and Brown communities (specifically in communities across Appalachia, the Colonias, Lower Mississippi Delta, and Native and Tribal regions), underscores our dedication to designing and implementing programs that equitably benefit underserved communities. Our efforts to advance racial equity are demonstrated through strategic community engagement, leveraging staff expertise, and facilitating critical discussions on equity.

Recognizing that systemic racism has marginalized Brown and Black communities and the people who live in them, HAC focuses its programs on these communities. In each of the past five years, over 40 percent of HAC’s loans were for projects in census tracts in which a majority people of identity as minority (all groups other than white non-Hispanic). Our lending team is intentional about breaking down barriers to access to capital for developers led or controlled by people of color. Of the 134 loans made by HAC over the past five years, 45 percent were to minority-led or controlled organizations.

Community Engagement

Our commitment to racial equity begins with actively involving underserved groups in every stage of our programs. We prioritize forming partnerships with nonprofit organizations to ensure



that our initiatives are grounded in the realities of the communities we serve. These collaborations are essential in designing programs that address the specific needs of these groups and lead to tangible reductions in racial disparities. By engaging directly with local nonprofits that represent those communities, we are able to solicit, obtain, and apply their input, ensuring that our projects are not only relevant but also impactful.

Examples of community engagement include:

- **Partnerships:** We have established strong ties with local community development corporations, small units of local government and other coalition groups, working collaboratively to identify needs and craft solutions.
- **Feedback Mechanisms:** We utilize surveys, focus groups, and town hall meetings to gather input from community members, ensuring their voices are integral to our program design and implementation.

Staff Expertise

HAC's diverse and skilled staff is a cornerstone of our ability to promote racial equity effectively. With a team that includes 25 percent Black/African American, 1 percent Native American, 8 percent Asian, and 16 percent Hispanic individuals, our staff's varied perspectives and cultural competencies enhance our capacity to serve underserved communities. Our team members speak multiple languages, including Spanish, Arabic, French, Omaha (Dhegiha), and Plains Indian Sign Language, which allows us to engage with a wide range of clients in their preferred languages. This linguistic and cultural diversity is crucial for fostering trust and ensuring accessibility.

National Rural Housing Conference

HAC hosts the National Rural Housing Conference, a platform where we address the evolving diversity and poverty in rural America. These sessions are pivotal in our efforts to advance racial equity, featuring discussions on how to incorporate equity into housing work and highlighting the administration's focus on racial and geographic equity.

Through these initiatives, HAC demonstrates a robust commitment to advancing racial equity. By involving underserved communities in meaningful ways, leveraging the diverse expertise of our staff, and fostering critical dialogues on equity, we strive to create programs that genuinely benefit Black, Brown, and other underserved populations. Our ongoing efforts are aimed at not only addressing immediate needs but also driving long-term, systemic change towards greater equity and inclusion in rural housing.

Experience with Environmental Reviews

HAC has extensive experience conducting environmental reviews in accordance with federal regulations, specifically 24 CFR part 50. Our commitment to compliance with these regulations will ensure that our RuralSEAM activities adhere to all environmental review requirements, thereby safeguarding both the environment and the communities we serve. As part of our SHOP program experience, HAC has successfully conducted hundreds of environmental reviews to comply with 24 CFR part 50. Our procedures ensure that no funds are committed or expended, nor any physical development activities initiated, until the environmental review process is completed. This compliance framework includes:



- **Risk Management:** Identifying potential environmental risks early in the project planning stages and developing strategies to mitigate those risks effectively.
- **Training and Expertise:** Providing training to our partners on environmental review requirements and best practices.
- **Quality Control:** Implementing rigorous quality control measures to ensure all environmental reviews are thorough and accurate.
- **Continuous Improvement:** Regularly reviewing and updating our environmental review procedures to incorporate new regulations, guidelines, and best practices.

Experience with Cross-Cutting Federal Requirements

HAC has extensive experience managing federal and non-federal awards, adhering to cross-cutting federal requirements, and ensuring compliance with established regulations. Over the years, HAC has successfully administered various federal programs, including but not limited to HUD Rural Capacity Building program, HUD Self-Help Homeownership Opportunity Program, USDA Rural Community Development Initiative, USDA Preservation Revolving Loan Funds, USDA Distressed Cities, CDFI Fund Capital Magnet Fund, and the National Endowment for the Arts Citizens' Institute on Rural Design. Additionally, HAC manages non-federal contracts and grants from notable organizations such as Capital One, The Home Depot Foundation, Federal Home Loan Bank System, Morgan Stanley, Bank of America, AARP Foundation, NeighborWorks America, and Wells Fargo Foundation.

Compliance with 2 CFR Part 200

HAC adheres to an established financial management system that provides the required controls to properly administer federal and non-federal contracts and grants in accordance with 2 CFR 200.302 and 200.303. Our internal manuals, including Accounting Policies and Loan Fund Policies and Procedures, along with related grant agreements, provide comprehensive guidance on financial control procedures and oversight responsibilities.

- **Financial Management Systems:**
 - **Internal Controls:** HAC maintains robust internal controls encompassing policies, procedures, job responsibilities, personnel, lines of authority, and the delineation of responsibilities, functions, and duties.
 - **Accounting System:** Our accounting system tracks sources and uses of funds, ensuring expenses are incurred for the proper period, actually paid, expended on eligible items, and approved by authorized personnel.
 - **Cash Management:** HAC's cash management system minimizes the time between receipt and disbursement of funds, ensuring efficient financial operations.

Compliance with Davis-Bacon Labor Standards

HAC ensures compliance with the Davis-Bacon labor standards for applicable projects. Our approach includes:

- **Wage Determination:** Ensuring that contractors and subcontractors pay laborers and mechanics prevailing wages as determined by the Department of Labor.



- **Certified Payrolls:** Requiring submission and review of certified payrolls to verify compliance with wage standards.
- **Site Inspections:** Conducting regular site inspections and interviews with workers to ensure adherence to labor standards.

Fair Housing and Nondiscrimination Requirements

HAC is committed to promoting fair housing and preventing discrimination in all our programs and activities:

- **Training and Policies:** Providing regular training on fair housing laws and maintaining policies that prohibit discrimination based on race, color, national origin, religion, sex, familial status, or disability.
- **Monitoring Compliance:** Regularly monitoring and evaluating our programs to ensure compliance with fair housing and nondiscrimination requirements.
- **Community Outreach:** Engaging with diverse communities to ensure that our programs are accessible to all eligible individuals and families.

Compliance with 49 CFR 24 (Uniform Relocation Act)

HAC ensures compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as outlined in 49 CFR 24:

- **Relocation Assistance:** Providing relocation assistance to displaced persons, ensuring they receive fair compensation and support.
- **Advisory Services:** Offering advisory services to assist displaced individuals and businesses in understanding their rights and available benefits.
- **Documentation and Reporting:** Maintaining thorough documentation of all relocation activities and reporting to ensure transparency and accountability.

Financial Management and Audit Compliance

HAC undergoes an annual examination of its financial records, financial statements, federal award transactions and expenditures, general management of operations, internal control systems, and federal assistance. Our staff possesses extensive knowledge and expertise in understanding and complying with 2 CFR Part 200 requirements.

- **Disclosure of Financial Results:** Regularly generating and reviewing reports detailing financial data on funding draws, disbursements, repayments, and budget-to-actual comparisons.
- **Audit Compliance:** Conducting annual audits, with RuralSEAM as a major program, ensuring that all activities are reflected on the Schedule of Federal Awards and addressing any identified internal control weaknesses or questioned costs.
- **Fund Accountability:** Maintaining funds in FDIC-insured bank accounts with appropriate approvals required to access funds, ensuring all assets are safeguarded and used for authorized purposes.

HAC's rigorous adherence to federal requirements, coupled with our established financial management systems and comprehensive policies, ensures our capacity to comply with 2 CFR



Part 200, Davis-Bacon labor standards, fair housing and nondiscrimination requirements, and the Uniform Relocation Act. Our experience and commitment to excellence position us to effectively manage and implement programs that advance our mission and uphold the highest standards of accountability and equity.



Exhibit F: Match or Leverage

Leverage Ratio

HAC proposes to leverage a \$75 million award with 4 percent (\$3 million) of the award in HAC loan capital to extend program impact nationwide throughout the entire PRICE 2024-2030 performance period. While we are committing to \$3 million here, HAC expects leverage will be significantly higher, based on our strong track record of raising enterprise-level capital for lending and investment.

Over the past five years, HAC has developed and implemented a strategic fundraising plan that has allowed us to diversify and increase revenue streams, particularly from private sources. As a result of successful implementation of this plan, we have secured almost \$12 million in new enterprise-level debt capital for direct project investment and over \$7 million in private grants in 2022 and 2023.

Federal funds will not be used for the leverage source. The funds HAC is committing to leverage were secured from investments by financial institutions and other institutional investors.

Project Risk and Contingency Plan

The primary risks to achieving HAC's RuralSEAM proposed vision and goals are rising land and infrastructure construction costs, lack of qualified construction and trade professionals in rural communities, and, most critically, being awarded less funding than requested.

Land acquisition costs have been rising in many communities, as have the costs of new manufactured homes, and infrastructure construction costs became volatile during the COVID pandemic and have remained at challengingly high levels. HAC is seeing projects experiencing cost increases as high as 40 percent over initial budgets. These costs are impacting projects in several ways – infrastructure projects and land acquisitions are taking longer to close as owners seek out additional resources to close last-minute gaps or change construction scopes; long-planned projects are being abandoned or postponed as a result of increased costs. The project-level risks are mitigated by requiring additional contingencies and rate cushions during the predevelopment phase, and by increased availability of public funding to fill project gaps in some markets. The RuralSEAM funds themselves are a significant mitigant – having grant or low-cost funds available for land acquisition and infrastructure improvements improves feasibility of projects in a rising cost environment.

Another mitigant is the work of our Training & TA team, which helps customers navigate their way through stalled projects.

If HAC were to receive less than the \$75 million requested, we would scale down the proposed activities to a budget that reflects the award amount. Each activity proposed – technical assistance, financing, and assistance to heirs' property owners – can be addressed in one rural community, five, or 50.



Exhibit G: Long-Term Effect

Preventing Evictions and Displacement

In rural communities, one of the greatest challenges to housing affordability is a lack of supply. In fact, in the past ten years, ACS data shows that just 14 percent of new housing units have been built in rural counties, even though 19 percent of the population calls them home. HAC's proposed activities will preserve the affordability of existing properties, and bring new units of affordable housing in manufactured home communities or scattered site properties. As noted previously, units receiving PRICE funds through RuralSEAM will have a minimum of 15-year affordability and a maximum of 25 years, depending on the type and amount of the investment. This will ensure that current and future residents of these properties will not be priced out of the community.

Ensuring Long-Term Affordability

The primary mechanism that HAC will use to ensure the long-term affordability is providing low-rate loans and grants for the land. Lower financing costs to the nonprofit landowner will allow them to keep land rents low which will provide manufactured homeowners with increased financial security. Additionally, HAC's deed restrictions will require that the community adopt or maintain tenant site lease protections consistent with or greater than those required by Fannie Mae or Freddie Mac. HAC will provide a sample lease addendum but awardees can provide an alternative if it meets these requirements. The lease addendum will include provisions for notices of rent increases, renewable leasing structures, right to purchase or sell, right to sublease, advance notice of planned sale or closure of a community and additional provisions to ensure residents know their rights and are protected from displacement.

Promoting Stable Homeownership

HAC's vision for its RuralSEAM activities is to improve the stability of housing and equity for manufactured housing residents, including homeowners. We will achieve this by reducing evictions and displacement by 1) providing technical assistance to nonprofits who own or wish to become owners of manufactured housing communities, 2) providing grants and low-rate loans to nonprofits and public entities for the acquisition and development of manufactured housing communities and infrastructure improvements in those communities and other nonprofit owned communities, and 3) providing funding to legal-aid organizations to assist manufactured housing property owners dealing with land tenure/title issues.

Two of HAC's proposed activities – financing and technical assistance – will serve primarily nonprofit and public entities that already own manufactured housing communities or want to purchase or develop manufactured housing communities. The grants and low-rate loans made by HAC will allow mission-first organizations to compete effectively to purchase manufactured housing communities at risk of being purchased by profit-first organizations that are much more likely to undertake practices designed to displace the existing homeowners from the property. Tactics frequently seen are increasing lot rents to unaffordable levels forcing the homeowners to move, allowing infrastructure to deteriorate until the property becomes uninhabitable, or closing the community and evicting the tenants to convert the property to another more profitable use.

HAC's third proposed activity will provide funding to legal-aid organizations to assist manufactured housing property owners dealing with land tenure/title issues. Assisting



manufactured homeowners clear their heirs' property issues and tangled title unlocks lost equity and promotes the owners' stabilization.

Advancing Racial Justice for Undeserved Rural Communities

Because HAC's programs and services are focused on low- and very low-income households in the most economically distressed rural places, our investments have significant short- and long-term positive outcomes and create economic opportunities. Over our 53-year history, HAC has provided over \$465 million in low-interest loans to affordable housing developers, supporting 64,655 affordable housing units in rural communities nationwide. Further HAC has given many small nonprofits their first loans, allowing them to grow over decades to be strong rural housing producers.

The projects supported by HAC are nearly all targeted to households under 80 percent of AMI, with over 50 percent targeted to households under 50 percent of AMI. In FY23, 76 percent of HAC's dollars invested were in high-poverty areas, 25 percent of our loan dollars were invested in persistent poverty counties, and 45 percent of households supported were headed by racial or ethnic minorities.

The dollars spent on housing rehab or new construction translate directly into local jobs and economic stimulus. Using multipliers based on 2020 National Association of Home Builders research, the direct economic impact of HAC's past five years of investments created 11,057 jobs in distressed communities and added \$95.1 million in state and local tax revenue.

HAC investments have positive long-term impacts on family outcomes. With the affordability of the HAC-funded housing units and the support of local nonprofits, 95 percent of units surveyed by HAC still house their original occupants.

Livable, Sustainable, and Resilient Rural Communities

Rural areas also have unique economic challenges in the face of disasters. A higher incidence of persistent poverty in rural areas manifests as a higher incidence of manufactured homes, concentrating the problems that come along with them. After a disaster, these homes are more likely to be damaged and not salvageable, putting vulnerable populations at risk.

The activities proposed under RuralSEAM will make rural manufactured housing and manufactured housing community more livable, sustainable, and resilient. The technical assistance and training provided will help mission-first organizations on a range of topics, including property management best practices, capital/infrastructure improvement planning and implementation, regulatory compliance, financial management, and resident engagement strategies, that will promote the livability and sustainability of their properties.

When RuralSEAM funds are proposed to be used for acquisition or infrastructure improvements at an MHC community, HAC will work with the nonprofit to assess resiliency of the property, utilizing FEMA's Resilience Analysis and Planning Tool (RAPT) and the Resilient Assessment Tool for CDFIs created by the University of New Hampshire (UNH) Carsey School of Public Policy and other resiliency assessment tools. This UNH assessment tool assesses a variety of project-specific resiliency factors, assesses vulnerability and risk by looking at historic and potential stresses and shocks (disasters), and can be used to identify the options and methods to improve the resilience of the community from potential stresses and shocks. Based on the results of the resiliency assessment, each project funded with RuralSEAM will develop a scope and plan



for resiliency. Specific measures will be based on the particular risks in each community to provide for the long-term resiliency and livability of the community.

Heirs' property owners may face barriers when preparing for weather-related hazards and during post-disaster recovery. Clear property titles are required for multiple preparatory recommendations including acquiring property insurance and accessing financing for roof and anchoring system reinforcements for the manufactured home. Additionally, after a disaster, property owners must submit proof of ownership to access disaster recovery funding. Helping low- and moderate-income manufactured homeowners ensure they have clear documentation to their property is critical to ensuring rural communities can adequately prepare and respond to the impact of disasters.



Preference Points: Policy Initiatives

HAC respectfully submits that preference points are merited for the program structure of the proposed acquisition and infrastructure improvement financing, which incentivizes extending affordability beyond the 15-year minimum, up to 30 years, depending on the use of the funds and amount of financing per lot/home.

Amount of Investment	Low Cost Loan	Grant
Up to \$5,000 per lot/home	15-year affordability period	20-year affordability period
Over \$5,000 per lot/home but up to \$15,000 per lot/home	20-year affordability period	25-year affordability period
Over \$15,000 per lot/home	25-year affordability period	30-year affordability period

Renters of homesites financed or improved with RuralSEAM funding will pay no more than 30 percent of gross income on housing costs including the cost of their unit financing or rent, home site rental, fees, and utilities, per HOME requirements. HAC's primary mechanism to balance affordability with the opportunity to build financial security and wealth for manufactured homeowners is providing low-rate loans and grants for the land. Lower financing costs to the nonprofit landowner will allow them to keep land rents low and thus provide manufactured homeowners with increased financial security.



ENDNOTES

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Attachment A: Advancing Racial Equity

The Housing Assistance Council (HAC) aligns its grant initiatives with Executive Order 13985 and federal fair housing and civil rights laws, affirming its dedication to racial equity and support for underserved communities. Our targeted efforts uplift nonprofits and units of local government, particularly within regions historically affected by poverty and systemic neglect, including Central Appalachia, the Border Colonias, the Mississippi Delta, the rural Southeast, Native American Lands, the Black Belt region, and areas with significant farmworker populations.

Analysis of Racial Composition

HAC implements a competitive and impartial application process to select organizations for all of its assistance, including the proposed RuralSEAM program, ensuring equitable opportunities for advancement and growth. HAC engages with organizations serving high-need areas, and we evaluate commitment to racial equity and strategy implementation readiness to strengthen community-serving organizations. Our selection process rigorously assesses each applicant's commitment to the community they serve, racial equity, and their readiness to implement strategies that benefit underserved communities.

Identification of Potential Barriers

HAC recognizes barriers such as resource allocation inequity, infrastructural disparities, and cultural barriers. We ensure the selection process for working with groups is equitable and inclusive, addressing the systemic issues that create these barriers.

Steps to Reduce or Eliminate Barriers

HAC is dedicated to empowering our beneficiaries through a suite of strategic actions aimed at enhancing service delivery in marginalized regions. We provide targeted support and capacity building to ensure groups can effectively serve their constituents. Additionally, we advocate for diversity in the leadership of our beneficiaries, understanding that decision-making that mirrors the community's diversity is crucial in serving the interests of communities of color and in promoting equitable development.

Measures to Track Progress and Evaluate Effectiveness

HAC is committed to ensuring progress towards racial equity through efficient tracking and evaluation methods. We monitor service provision for equitable distribution and impact, periodically review our beneficiaries' initiatives for their role in fostering racial equity and maintain transparency by reporting on our racial equity endeavors. This approach underpins our accountability and facilitates the refinement of strategies to enhance our impact within the communities we serve.

Our actions, within the bounds of federal nondiscrimination requirements, illustrate HAC's concrete steps to not only serve but also empower communities through racial equity-driven grant activities.

Attachment B: Affirmative Marketing

The Housing Assistance Council (HAC) is committed to affirmative marketing that ensures broad awareness and accessibility of services, particularly to those in rural America who are least likely to apply. Our strategy is to utilize established relationships and effective online outreach to connect with diverse, underserved populations.

Leveraging State and Regional Partnerships

HAC's outreach strategy is rooted in collaboration with state and regional entities that share our goal of safe, decent, and affordable housing. By relying on these existing partnerships, we harness the power of word-of-mouth to disseminate information about our services. This grassroots approach leverages the trust and respect these entities have built within their communities to reach a wider audience, including those who might otherwise remain unaware of the opportunities available.

Speaking Engagements and Professional Networks

HAC staff regularly and actively participate in and speak at state, regional, and local events targeting housing and community development professionals in rural areas. These engagements allow us to connect with those on the front lines of service provision and to ensure they are equipped with the latest information on HAC's initiatives, enhancing their ability to inform and assist potential applicants.

HAC's initial request for proposals (RFP) offering grants and loans for acquisition and infrastructure funding will be marketed widely through HAC's website and email lists. HAC will also conduct targeted outreach to our extensive network of existing borrowers and technical assistance clients, to the NeighborWorks America membership through a partnership with NeighborWorks, to rural members of the National Association of Housing and Redevelopment Officials (NAHRO), and to organizations that are part of the National Community Stabilization Trust's Homeownership Alliance. HAC will also work with other trade associations representing nonprofit and public affordable housing organizations. Similarly, HAC will publicize its RFP for heirs' property resolution grants through trusted legal partners, HBCU law school networks, and Land Grant Extension networks, and will highlight the RFP widely through HAC's website, social media, and email lists.

Robust Online Presence and Social Media Engagement

A cornerstone of our strategy is the maintenance and expansion of our online presence. HAC's website and social media channels are optimized for high visibility in searches related to rural and affordable housing. We tailor our digital content to be culturally and linguistically appropriate, engaging diverse audiences and ensuring that information about our grants resonates with and is accessible to everyone, including rural communities of color and underserved populations.

Monitoring and Adaptation

We continuously monitor the reach and impact of our affirmative marketing efforts, prepared to adapt and refine our strategies. By analyzing our online presence's effectiveness and feedback from our state and regional partners, we can ensure that our marketing efforts are as effective and inclusive as possible.

HAC's affirmative marketing plan is designed to be both effective and flexible, respecting the diverse nature of the communities we serve while ensuring that information about our grants and services is accessible to all, especially those in rural areas who may be unaware of these opportunities.

Attachment C: Affirmatively Furthering Fair Housing

The Housing Assistance Council (HAC) has been at the forefront of advancing equity, supporting underserved communities, and enhancing fair housing and civil rights for over five decades. Our mission, deeply embedded in serving the poorest of the poor in the most rural places, aligns with our commitment to Affirmatively Furthering Fair Housing (AFFH) and addressing the needs of Black, Latino, Indigenous, Native American, Asian, Pacific Islander, and other persons of color. Our comprehensive approach includes educating PRICE beneficiaries on federal fair housing laws, promoting integration, and increasing access to opportunities for protected class groups.

HAC will work closely with RuralSEAM participating organizations to affirmatively further fair housing by taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. For organizations carrying out activities in jurisdictions with an accepted Assessment of Fair Housing (AFH), the proposed activities will be consistent with the AFH's fair housing goals and with fair housing strategies specified in the jurisdiction's Consolidated Plan or Public Housing Agency Plan. For organizations carrying out activities in jurisdictions without an accepted Assessment of Fair Housing (AFH), the proposed activities will adhere to the guidelines outlined in their state's Consolidated Plan.

Additionally, HAC's proposed activities are designed not only to comply with the Fair Housing Act but to actively promote fair housing principles. This is achieved through:

- **Education on Fair Housing:** Offering training sessions that delve into fair housing laws, patterns of segregation, and actionable strategies to combat housing discrimination. An illustrative example is our pre-conference session at the 2018 National Rural Housing Conference, focusing on the Fair Housing Act's 50th anniversary and its implications for current housing practices.
- **Technical Assistance:** Providing tailored assistance to beneficiaries, to develop fair housing marketing plans and conduct analyses of impediments to fair housing, thereby ensuring that housing initiatives are inclusive and accessible to all.
- **Expanding Housing Choices:** Ensuring that housing created or preserved leads to broader housing choices for protected classes. This involves guiding beneficiaries in developing inclusive housing projects that serve diverse populations.

Attachment D: Eligible Applicant Documentation

Threshold Eligibility Requirements

The Housing Assistance Council (HAC) meets all Threshold Eligibility Requirements identified in Section III.D. of the NOFO:

1. **Resolution of Civil Rights Matters.** HAC has no outstanding or unresolved civil rights matters related to any prior grant awards with HUD.
2. **Timely Submission of Applications.** HAC is submitting the application before the deadline.
3. **Eligibility Information.** HAC is a public nonprofit entity under Section 501(c)(3) of the Internal Revenue Code (IRS determination letter issued in April 1974, Attachment 2) organized and operated exclusively for exempt purposes. HAC is also a certified CDFI. HAC's UEI is TDMWJK6LBAP3 and HAC maintains a System of Award Management (SAM) active registration valid through March 14, 2025.
4. **Number of Applications.** HAC is submitting only one application under this NOFO.

Statutory and Regulatory Requirements

HAC meets all Statutory and Regulatory Requirements identified in Section III.E. of the NOFO.

1. **Universal Identifier and System for Award Management (SAM.gov) Requirements.** HAC's UEI is TDMWJK6LBAP3 and HAC maintains a System of Award Management (SAM) active registration valid through March 14, 2025.
2. **Outstanding Delinquent Federal Debts.** HAC does not have any outstanding delinquent federal debts and is eligible to receive an award of federal funds.
3. **Debarments and/or Suspensions.** HAC has not been debarred or suspended from doing business with the Federal government. HAC will also confirm that any organizations applying for and receiving PRICE funds have not been debarred or suspended.

4. **Pre-selection Review of Performance.** N/A.
5. **Sufficiency of Financial Management System.** HAC's financial management systems meet federal standards as described in 2 CFR 200.302. If HUD arranges for a survey of financial management systems, HAC will comply.
6. **False Statements.** No false statements have been made in this funding application. HAC certifies that statements made are true.
7. **Mandatory Disclosure Requirement.** HAC has no violations of Federal criminal law involving fraud, bribery, or gratuity violations.
8. **Prohibition Against Lobbying Activities.** HAC does not use or intend to use federal funds for lobbying activities. All PRICE affiliates will be required to complete an Application Assurance and Certification form stating that no federal funds appropriated have been or will be paid by/or on behalf of the affiliate for lobbying activities.
9. **Compliance with the Award Term in Appendix A of 24 CFR part 170.** As a recipient of grants from multiple Federal agencies, HAC has the necessary processes and systems in place to comply with the Award Term in Appendix A of 24 CFR part 170.