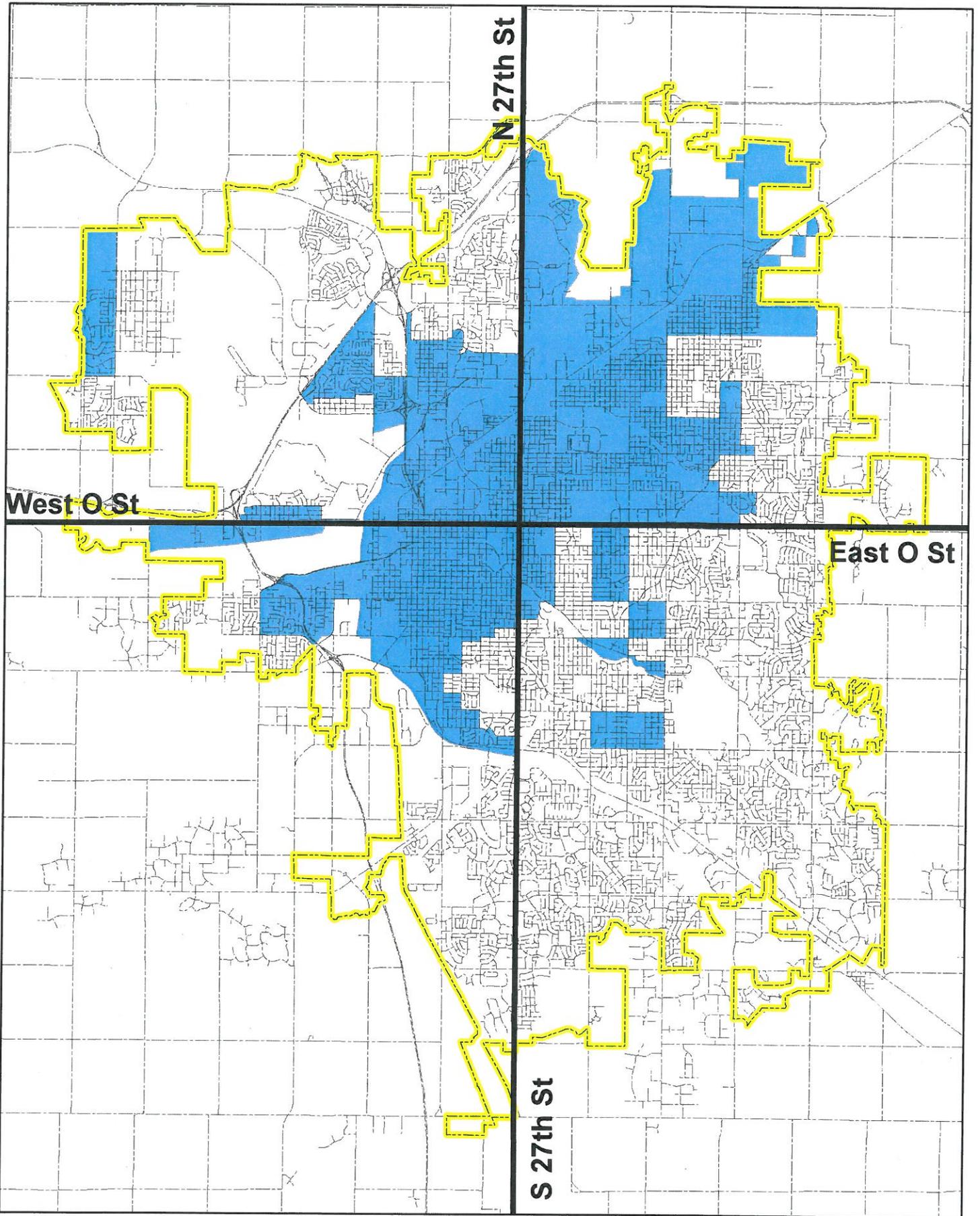


NRSA Area Map

 City Limit  Proposed NRSA

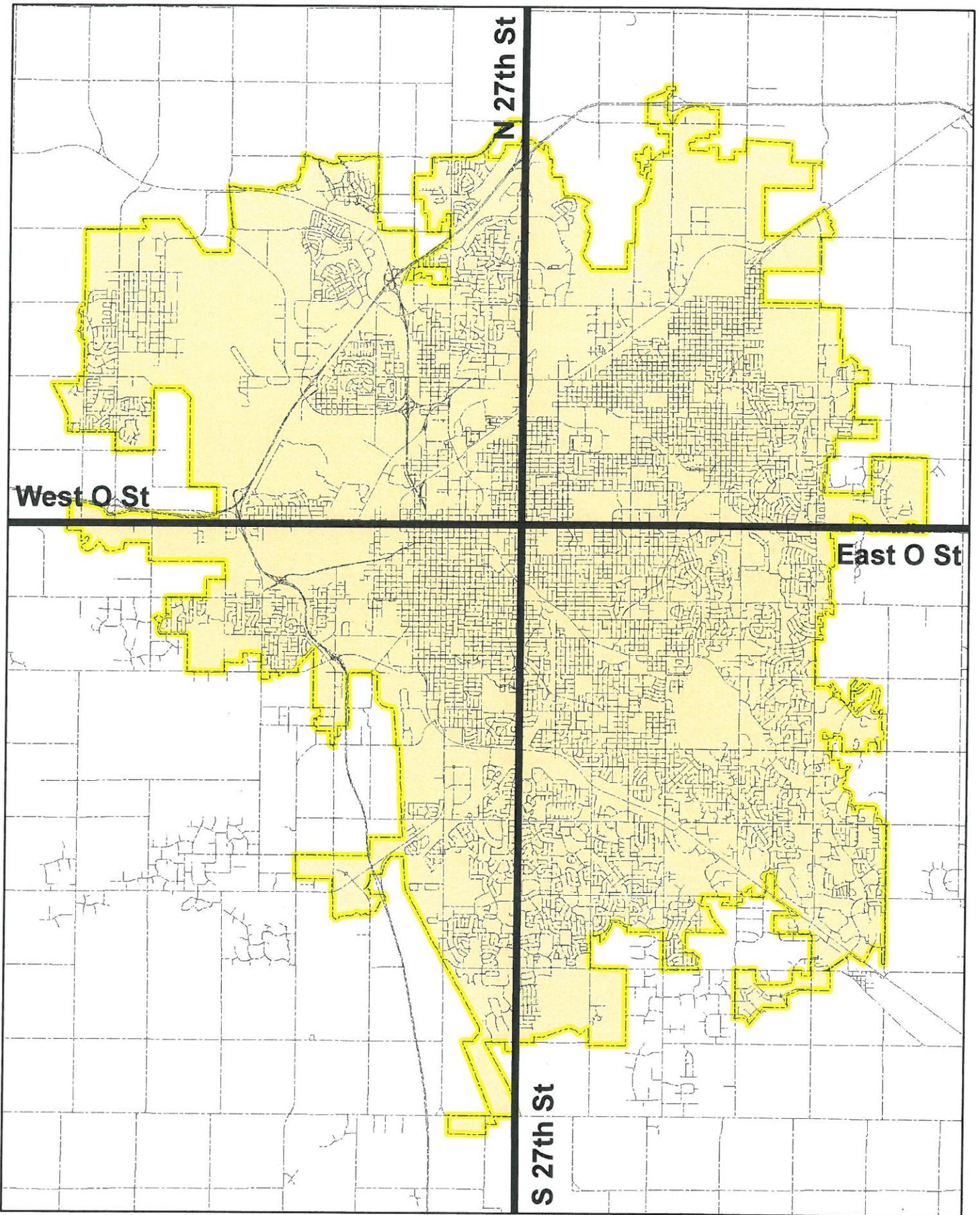




LMI Area Map

City Limit LMI





N 27th St

West O St

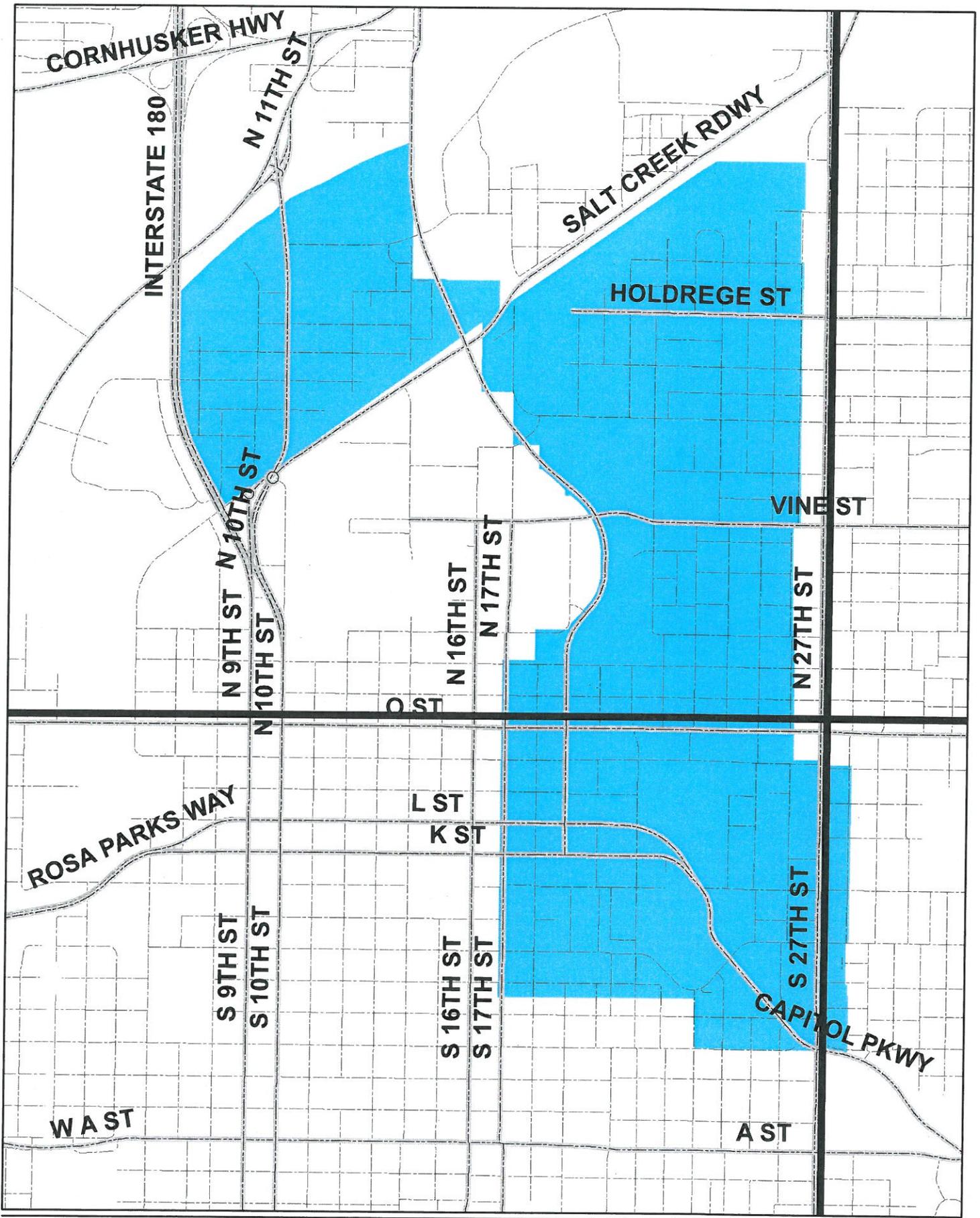
East O St

S 27th St

City Limit Project Area

 City Limit





Antelope Valley Project Area

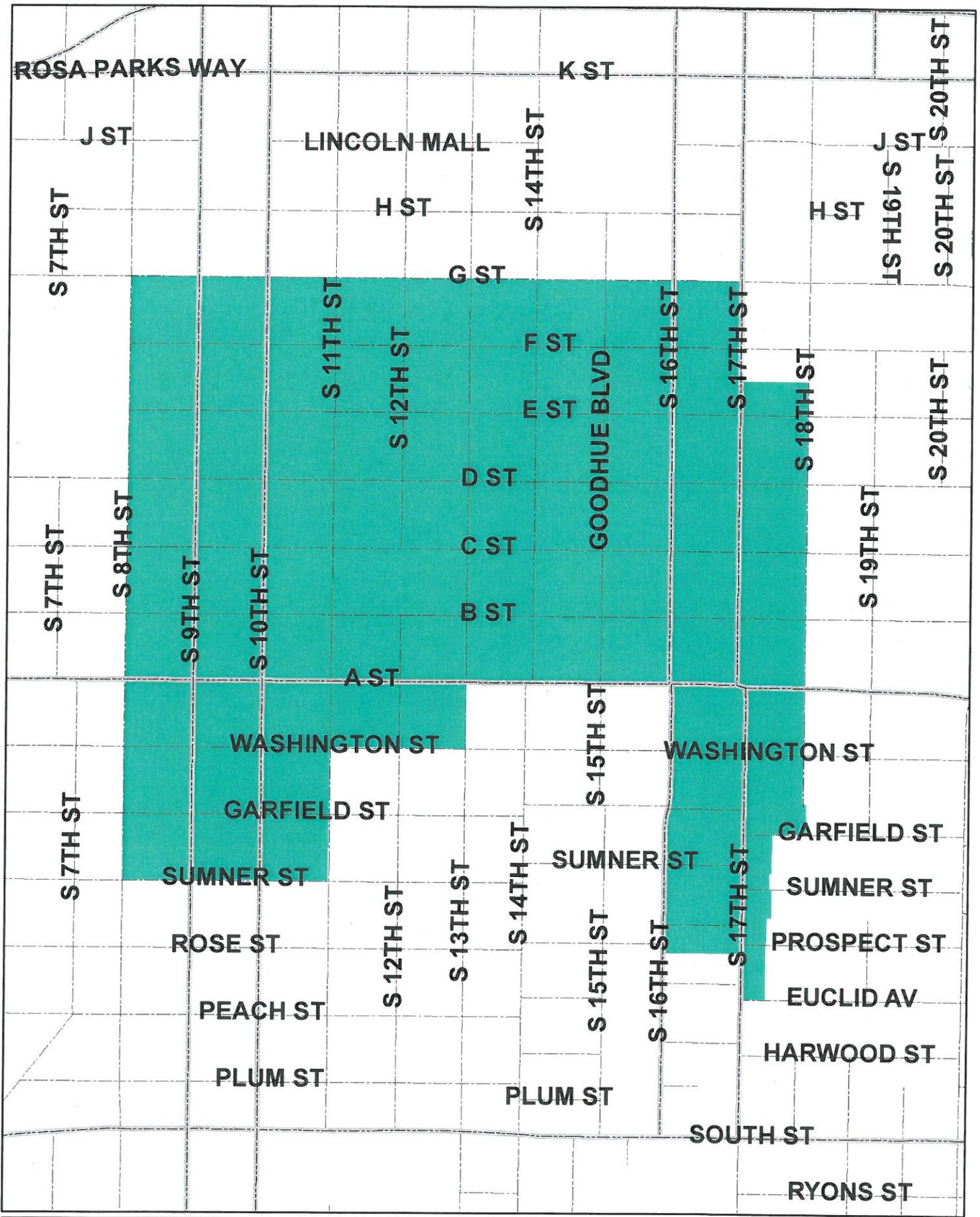


City Limit



Antelope Valley Project Area





South Capitol Project Area

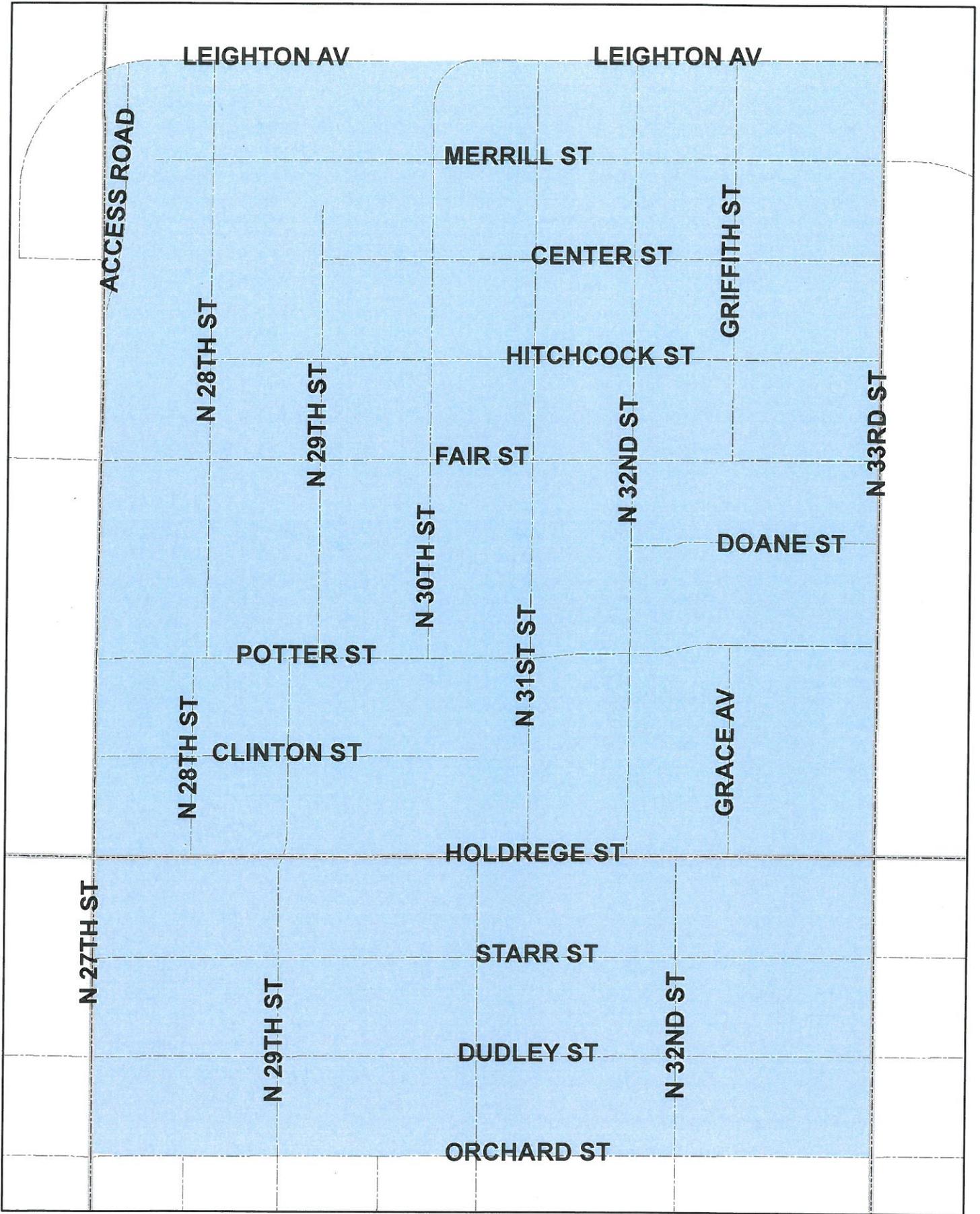


City Limit



South Capitol Project Area





Clinton Impact Project Area



City Limit



Clinton Impact Project Area



Institutional Structure

Housing

The institutional structure for providing affordable housing in Lincoln is a complex system of public and private partnerships. Private sector players may change over the years; public sector players remain fairly constant.

Urban Development Department (UDD): This City department has been in charge of the administration of federal entitlement funding since 1976. UDD's Housing Rehabilitation Division provides direct financial assistance for rehabilitation of residential units under a variety of programs carried out "in house". UDD also provides management and oversight in the use of these funds by non-profit organizations in carrying out City programs (i.e. NeighborWorks®Lincoln) or in the development of newly constructed housing.

Lincoln Housing Authority (LHA): The Lincoln Housing Authority has over 1,000 LHA-owned or managed units and administers another 2,800 tenant-based rental assisted units (vouchers and certificates). LHA's goal is not only to supply safe, affordable housing to low-income households but to move the tenants from welfare to work and convert renters into homeowners. In partnership with Lincoln Public Schools, a Northeast High School construction class builds a house each year which is sold to a public housing family on a lease-purchase agreement. LHA also provides financial support to homeless service providers and has developed its own low-income tax credit housing projects in non-low-income areas of the community, and provides downpayment assistance for clients moving to homeownership. LHA was created under State law by the City of Lincoln in 1946. LHA's Board of Commissioners has five members, all appointed by the Mayor of Lincoln and approved by the Lincoln City Council.

Nebraska Investment Finance Authority (NIFA): An independent (private) instrumentality created by the State of Nebraska to issue tax exempt revenue bonds for funding a variety of programs. NIFA's first mortgage loans have been a valuable tool for the City's first-time homebuyer program (administered by NeighborWorks®Lincoln). One of the NIFA programs targets the NRSA and offers a substantial below market rate enabling low-moderate income households to enter the home market which otherwise may be unobtainable. Under our Home Improvement Loan Program (HILP), four lenders use NIFA funds to loan to low- to moderate-income homeowners to rehabilitate their property. The City, using CDBG funds, buys down the interest rate to 0%. This has been a very successful ongoing program with a new agreement (terms and interest rate) every three years.

Private Non-profit Organizations (affordable rental housing): Over the years, numerous non-profit organizations have acted as sponsors and owners of affordable rental housing developments in Lincoln. These include: the Indian Center Inc., NeighborWorks®Lincoln, the YWCA, Mercy Housing Midwest, CenterPointe, Community Action Partnership (CAP) of Lancaster and Saunders Counties, AP Limited Partnership (Interfaith Housing Coalition), Program for People (Diocesan Housing), the Lincoln Medical Education Foundation, and in FY 2011, City Impact began an affordable housing Tax Credit project. Some of these entities are housing-centered agencies (Habitat, NeighborWorks®Lincoln, and Mercy). Others are expanding their mission to include housing (LAP, the Catholic Diocese, Lincoln Medical Education

Foundation, the Indian Center, and the YWCA). Still others were created with a singular housing project in mind (AP Limited). Some of these entities have taken on more than one project; others stop (or have stopped) at one.

Private Non-profit Organizations (Homeownership):

NeighborWorks@Lincoln: NeighborWorks@Lincoln (NWL) is a private non-profit organization involved in a variety of activities in partnership with the City to promote and assist in homeownership. NeighborWorks@Lincoln provides Homebuyer training funded with CDBG and downpayment assistance funded with HOME or Nebraska Affordable Housing Trust Funds (NAHTF) through the Nebraska Department of Economic Development. NWL builds new houses in cooperation with Lincoln High School construction trades students and with YouthBuild. Problem properties are purchased, renovated/redeveloped and sold to a first time home buyer under the Troubled Property Program. Using stimulus funds called the Neighborhood Stabilization Program, vacant, blighted and/or foreclosed properties were renovated or redeveloped. The Antelope Creek Village project adds affordable housing units in the Antelope Valley area. NWL's community builder works with neighborhood organizations on revitalization efforts to increase home ownership and build community pride through the Free-to-Grow program.

Habitat for Humanity: The Lincoln-Lancaster County Habitat for Humanity is a not-for-profit corporation incorporated on February 12, 1988 as an affiliate of Habitat International, Inc. Their mission is to create decent affordable housing for those in need and to make decent shelter a matter of conscience. Each year, Urban Development assists with HOME funding for lot purchases, site selection and environmental review.

Nebraska Housing Resources Inc.: Neighborhood Housing Resources is a non-profit corporation formed in June, 1998 by three members of the Home Builders Association of Lincoln. Its purpose is to provide affordable low- and moderate-income housing opportunities for first-time buyers in Nebraska. It achieves this purpose by encouraging more homebuilders to enter and/or expand into this market by increasing the supply of affordable lots and arranging attractive financing packages for qualified homebuyers. Partnering with the Urban Development Department, Neighborhood Housing Resources has created 188 affordable home ownership new construction units in four projects in Lincoln. NHR will continue to serve the community by building individual houses on an infill basis as it can, although it is now inactive.

Affordable Housing Initiative (AHI): AHI is a private non-profit organization dedicated to the rehabilitation of one to two housing units a year in the NRSA. The qualified buyers completed home buyer training through NeighborWorks@Lincoln and received down payment assistance from UDD's First Home Program. Funding is no longer provided by UDD due to cuts in federal funding.

Rebuilding Together (formerly Christmas in April): Rebuilding Together was a non-profit organization with a mission to provide rehabilitation services to low-income elderly homeowners. The organization dissolved in 2010. It continues to be included here as it was identified in the *3 Year Strategic Plan FY 2010-2012*.

State of Nebraska, Department of Economic Development (DED): The Department of Economic Development's Affordable Housing Trust Fund is intended to provide funds to eligible recipients for acquisition, rehabilitation, construction, and production of affordable housing to increase the supply of decent, safe, and sanitary housing for low- to moderate-income Nebraskans. The program also provides leverage of private investment in the development of affordable housing. Urban Development has used the Nebraska Affordable Housing Trust Fund (NAHTF) to develop affordable new construction housing projects. Beginning in 2009, Urban Development was able to access Neighborhood Stabilization Program funds which is a federal program to stabilize neighborhoods by acquiring vacant, foreclosed or blighted properties and rehabilitate or redevelop.

Private Owners of Project Based Assisted Housing: Under Federal housing programs created in the 1980s, numerous private for-profit entities developed affordable housing for families and elderly persons in Lincoln.

Fair Housing

Lincoln Commission on Human Rights: The legal authority for enforcement and decision-making on all complaints of discriminatory actions prohibited by Lincoln's Municipal Code rest with the City's Commission on Human Rights. The Commission, with nine members appointed by the Mayor, receives support from the City's Equal Opportunity Officer, who supervises the staff needed for the daily operation of the Commission. The Commission acts as an advisory body to the Mayor, City Council, and Equal Opportunity Officer, and also has responsibility for reviewing compliance with Affirmative Action and proposing amendments to the City's anti-discrimination ordinance as necessary. The Commission not only investigates, hears, and acts on complaints of discrimination, it is also charged with educating the public about unlawful discriminatory practices and enforcement measures, formulating City policies to eliminate discrimination. In September 2010, the director of the Lincoln Commission on Human Rights retired. In January, 2012, a new director was hired and the commission is now fully staffed.

Urban Development Department (UDD): As administering entity for the City's federal housing and community development entitlement programs, the Urban Development Department is also responsible for ensuring that the City's programs comply with non-discrimination and equal opportunity requirements. For housing, these requirements include the following: the Fair Housing Amendments Act of 1988, Equal Opportunity in Housing (Executive Order 11063), Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973 as amended (Handicap accessibility). UDD is responsible for preparing the City's Analysis of Impediments of Fair Housing and monitoring the implementation of activities to remove the barriers identified.

Nebraska Equal Opportunity Commission (NEOC): The NEOC was created by the Nebraska Legislature in 1965 and is authorized to enforce several state statutes, including the Nebraska Fair Housing Act. This Act is substantially equivalent to Federal Fair Housing Law and to prevent duplication of proceedings. The NEOC is authorized by federal statute to investigate complaints alleging violations of Title VII of the Civil Rights Act of 1964 and the U.S. Fair Housing Act. It is currently the only

"local" agency that can provide relief under federal law to victims of housing discrimination in Lincoln.

League of Human Dignity: The League is a consumer-based non-profit organization, whose purpose is to actively promote the full integration of persons with disabilities into society. In doing so, this organization advocates for the needs and rights of persons with disabilities, including access to housing. The League has an ADA/Disability Rights Program which provides public education on ADA.

Fair Housing Center: The Fair Housing Center of Nebraska, located in Omaha, is a private non-profit organization that investigates alleged violations of the Fair Housing Act and state and local fair housing laws, and carries out research on discrimination and compliance with fair housing laws. The Fair Housing Center can help people file complaints of alleged housing discrimination and provide assistance and support for seeking retribution under fair housing law. They conduct testing and other investigatory techniques to determine whether discrimination occurred. The Center works to mediate or seek voluntary resolution of discrimination after complaints have been filed.

REALTORS® Association of Lincoln, Equal Opportunity Cultural Diversity Committee: In 1998, this committee worked to institute mandatory fair housing training for licensed REALTORS® in Lincoln. These sessions were implemented to better educate Lincoln REALTORS® on the Fair Housing Act and other fair housing laws. Of specific importance is how these laws are used to protect people with disabilities against discrimination when buying or renting a home.

Lincoln's Continuum of Care (CoC)

Lincoln's CoC includes homeless service providers and programs that make up the fundamental components of a "continuum" of homeless services from prevention programs and emergency shelters all the way through to supportive permanent housing. Also included are the organizations and entities that provide financial resources and other support activities for homeless services. In addition, the CoC includes representation from the business community, the Lincoln City Council, County government, the Lincoln Police Department, the University of Nebraska-Lincoln Police Department, Nebraska Wesleyan University, the State Department of Health and Human Services, and homeless consumers.

The CoC is led by an executive committee that includes a chair, co-chair, immediate past chair, treasurer, and a representative from the Urban Development Department. The executive committee is nominated and elected each year by majority vote of the CoC.

Emergency Shelter and Services: Emergency shelter is overnight or short-term temporary shelter, including day shelters that provide meals and limited supportive services and financial assistance to the homeless in general or for specific populations of the homeless. These facilities provide an immediate alternative to the street and have a component that can identify an individual's or family's needs. Agencies providing emergency shelter and services include the following:

Overnight Shelters

- Friendship Home
- People's City Mission

- Cedar's Youth Services
- Veteran's Hospital

Overnight Shelter Facilities/Programs

- Hotel/Motel Partnership Program
- Developmental Services of Nebraska
- Cornhusker Place
- Cedar's Youth Services
- Community Mental Health Center

Day Shelters

- Lighthouse
- People's City Mission

Case Management (homeless)

- Community Mental Health Center
- Cornhusker Place
- Fresh Start
- St. Monica's
- Community Action Partnership (CAP) of Lancaster and Saunders Counties
- Matt Talbot Kitchen & Outreach
- Centerpointe
- Nebraska AIDS Project

Transitional Housing Programs: Transitional housing is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months. Supportive services include, but are not limited to, substance abuse treatment, short-term mental health services, independent living skills, child care, job training, health services, and transportation. Supportive services also implies case management services which ensure that persons receive necessary services, for example, that children attend school regularly. Transitional housing programs include the following:

Families

- Catholic Social Services
- Community Action Partnership (CAP) of Lancaster and Saunders Counties
- Lincoln Housing Authority
- Cedar's Youth Services
- Friendship Home
- St. Monica's Project
- Lincoln Medical Education Foundation
- Matt Talbot Kitchen & Outreach
- Fresh Start

Individuals

Men and/or Women

- Lincoln Housing Authority
- People's City Mission
- Fresh Start
- Houses of Hope
- St. Monica's

- Touchstone
- Cornhusker Place
- Community Mental Health Center

Youth

- Cedar’s Youth Services
- Developmental Services of Nebraska

Ex-Offenders

- House for New Life

Dual Diagnosis

- CenterPointe

Mental Illness

- Community Mental Health Center
- CenterPointe

Substance Abuse

- Cornhusker Place
- Houses of Hope
- St. Monica’s
- Touchstone

Veterans

- Houses of Hope

Permanent Supportive Housing: Below is a list of permanent supportive housing projects and programs. Some of the households and persons served by these programs do not meet the HUD definition of chronic homelessness; however, the remaining listed projects serve those who, without assistance, are at high risk of homelessness.

Permanent Supportive Housing Program providers for individuals who meet HUD’s definition of chronic homelessness

Individuals

- CenterPointe

Families

- Indian Center, Inc.
- Lincoln Housing Authority
- Mercy Services Corporation
- Catholic Social Services
- YWCA Garden Apartments

Single Adults

- Interfaith Housing Coalition Ambassador-President Apartments

Persons with Developmental Disabilities

- Community Alternatives
- Active Community Treatments, Inc.
- Developmental Services of NE, Inc.

- Mosiac
- Transfiguration
- Vital Services, Inc.

Persons with Severe Mental Illness

- OUR Homes
- Prescott Place
- Serenity Place

Persons with Physical Disabilities

- League of Human Dignity
- Madonna

Elderly Households (Limited Services)

- Lincoln Housing Authority (Burke Plaza, Mahoney Manor, Crossroads House)
- Mercy Services
- Malone Manor
- Indian Center, Inc.

Homeless Prevention and Other Supportive Services: Prevention is the most cost-effective way of addressing homelessness. Intervention methods that prevent foreclosure or eviction and supportive services for low-income households, physically, mentally, and/or emotionally disabled individuals, and other populations, are significantly less costly than strategies that provide emergency shelter and food for homeless individuals and families, and finance their "re-entry" into permanent housing. Prevention is also essential to reduce the demand for emergency relief. The Homeless Prevention and Rapid Re-Housing (HPRP) funding opportunity provided the impetus for unprecedented levels of coordination, planning, and program development of Lincoln's homeless prevention efforts. Although Federal funding for HPRP concluded in July of 2012, Lincoln's Rent & Utility Network will continue monthly meetings to preserve and continue a coordinated community response to prevention needs. In addition, Lincoln's CoC will continue to seek funding opportunities from the state and local levels to supplement existing prevention efforts.

Rent & Utility Assistance Network

- Community Action Partnership (CAP) of Lancaster and Saunders Counties
- Catholic Social Services
- Salvation Army
- People's City Mission
- Friendship Home
- Region V Systems

Direct Financial Assistance

- Community Action Partnership (CAP) of Lancaster and Saunders Counties
- Lancaster County Office of Health and Human Services
- Salvation Army HeatShare
- Veteran's Service Office
- Lincoln Housing Authority Security

Case Management (Special Needs Only)

- Community Mental Health Center
- Centerpointe
- St. Monica's
- Nebraska AIDS Project

Health Services

- Matt Talbot Kitchen & Outreach
- People City Mission Medical Clinic
- Urban Indian Health Center
- Lincoln-Lancaster County Health Department
- People's Health Center

Soup Kitchens/Meals

- Gathering Place
- Matt Talbot Kitchen & Outreach
- People's City Mission
- "F" Street Recreation Center
- Lighthouse

Funders: An important component in the institutional structure for providing homeless services is the entities that provide the financial resources for programs. Some of those funding sources are as follows:

U.S. Department of Housing and Urban Development (HUD): In the early 1980s, the federal government began, on a limited basis, addressing the issue of homelessness. However, it was not until 1987, with the passage of the Stewart B. McKinney Homeless Assistance Act, that the federal government assumed a "formal" role in addressing homelessness.

State of Nebraska: In 1992, the State of Nebraska established the Homeless Shelter Assistance Trust Fund (HSATF), with a dedicated revenue source generated from the sale of homes and other real estate.

City of Lincoln and Lancaster County: The City of Lincoln and Lancaster County both provide funds to local non-profit human service agencies through the Joint Budget Committee.

United Way of Lincoln and Lancaster County: The United Way distributes monies received during its annual fund drive to numerous local human service agencies.

Local Foundations: Lincoln has several local foundations; three of these have been in the forefront in providing support for many human service agencies, including those that serve the homeless - Woods Charitable Fund, the Lincoln Community Foundation, and the Cooper Foundation.

Private Donations, Non-United Way: Direct donations from private individuals, groups, or corporations provide an important source of revenue for local homeless service providers.

Economic Development

Workforce Development and Business Development

The following is a partial list of economic development resources – both workforce development and business development – available in the Lincoln area. This, of course, is not an exhaustive list. Additional sources of business services, including membership organizations such as the Lincoln Independent Business Association (LIBA), the Chamber of Commerce and the Nebraska Home-based Business Association, are also available, but are not listed.

Economic Development. Continued fragmentation of economic development efforts in Lincoln and Lancaster County prompted the City, County, and Lincoln Electric System to jointly fund an economic development and marketing strategy study in FY 02. The study, conducted by Angelou Economics from Austin, Texas, outlined economic development goals, strategies, and an implementation plan for Lincoln to follow over the following five years to create higher paying jobs in a diverse economy. The plan clearly identified the Lincoln Partnership for Economic Development (LPED), the City of Lincoln and other partnering organizations' roles in economic development. The plan also helped identify a new brand identity and marketing strategy to help accomplish growth.

The Angelou study identified that several organizations currently speak for Lincoln's economic development efforts. This portrays a confusing message to prospects and clients. To eliminate confusion, partnering economic development organizations have established LPED as the lead clearinghouse for economic development information and initiatives in Lincoln. In addition, a communication network among all the Lincoln area economic development organizations was developed with the newly formed Lincoln Economic Development Council (LEDC) leading the way. LEDC is comprised of staff from the Mayor's Office, LPED, Chamber of Commerce, Lincoln Electric System (LES), Aquila (Natural Gas Provider), Lincoln Airport Authority, the University of Nebraska Technology Park, and the Nebraska Department of Economic Development (NEDED). This group meets regularly to develop project leads, make referrals, and exchange information.

This close collaboration among economic development organizations has already resulted in the development of an on-line site selection database developed in conjunction with local commercial real estate brokers and the Multiple Listing Service.

With assistance from Lancaster County, LES, DED, and the LPED, the Nebraska Business Visitation Program continues in Lincoln on an annual basis. Through this program, City, LES and LPED staff visit and conduct interviews with key industries in Lincoln.

An additional economic development committee comprised of City and County staff from various departments was developed in FY 01 and continues to meet regularly. This committee, lead by the Economic Development Coordinator for the Mayor's Office, meets to discuss and plan numerous economic development projects.

Referrals from Urban Development to the Nebraska Business Development Center (NBDC), the Nebraska Economic Development Corporation (NEDCO), the Lincoln Partnership for Economic Development (LPED), the Chamber of Commerce, the Downtown Lincoln Association (DLA), Lancaster County Economic Development Loan

Program, and the State of Nebraska Department of Economic Development (DED) are on-going.

Greater Lincoln Workforce Investment Board (LWIB): The Workforce Investment Act of 1998, Public Law 105-220, states as its purpose "...to provide workforce investment activities, through statewide and local workforce investment systems, that increase the employment, retention, and earnings of participants, and increase occupational skill attainment by participants, and, as a result, improve the quality of the workforce, reduce welfare dependence, and enhance the productivity and competitiveness of the Nation." The LWIB oversees the implementation and operation of the Lincoln Area Workforce System and One Stop Career Center that offers expanded services to job seekers and area businesses.

Neighborhood Revitalization

City of Lincoln: Urban Development partners with multiple departments for project implementation and activities including the following (descriptions taken from the City's web site):

Urban Development Department: The primary objective of the Urban Development Department is the revitalization and maintenance of low- and moderate-income communities as productive and vigorous parts of the City as a whole. Strategies and programs are created, many using federal financial resources, which:

- Coordinate existing city-wide resources – both public and private,
- develop leadership at the individual, neighborhood, and agency level,
- eliminate barriers – physical, social, and economic, and
- create economic and employment opportunities.

Public Works and Utilities: The purpose of the Department of Public Works/Utilities is to serve community growth, well-being, and economic success. Working together to provide quality services to our community, we finance, design, construct, operate and maintain:

- Municipal Water
- Waste Disposal
- Drainage
- Transportation Systems

A new partnership began in FY 10 with the Watershed Management Division of Public Works and Utilities, for the rain garden projects.

Building and Safety: Our responsibility is to assure that the health, fire, and housing safety needs of the public are maintained through adherence to those requirements established by law in the construction or use of every building in the community. This includes buildings in which people live, eat, sleep, play, work, worship, study, recuperate or are entertained. By accomplishing this mission the quality of life in the community is enhanced.

Parks and Recreation: Studies show that many do not understand the value parks and recreation brings to our community's quality of life. We feel a responsibility to close that gap—and to inspire more people to learn why a quality parks and recreation system is fundamental to youth development,

active living, neighborhoods and families, special places and community events, and economic development. Most of all, we want to inspire you to enjoy the opportunities we offer.

Lincoln/Lancaster County Planning Department: The Lincoln/Lancaster County Planning Department promotes and facilitates the efficient, high-quality development of the City of Lincoln and Lancaster County resulting from meaningful interaction with our customers and the community.

Lincoln-Lancaster County Health Department: Protect and promote the public's health. It's vision is a sustainable public health system serving all people to achieve optimal health

Lincoln Police Department: Operates Crime Stoppers, Neighborhood Watch, uses Community Police Teams and operates under the philosophy of Community Based Policing.

Problem Resolution Team (PRT): A multi-agency, multi-departmental team created to address long-term problem properties.

Focus Area Concept Team (FACTeam): A multi-departmental team created to assist in identifying issues and focusing resources in neighborhood focus areas.

Other Entities:

Railroad Transportation Safety Board (RTSD): The Railroad Transportation Safety Board helps to plan and then fund the implementation of revitalization projects involving railroad safety.

State Department of Roads: Assists in funding some transportation projects.

Federal Department of Transportation: Assists in funding transportation projects.

Lower Platte South Natural Resources District (LPSNRD): Assists in planning and funding projects and maintenance of soil and water resources.

Army Corps of Engineers: Assists in planning and funding projects, in the case of the City of Lincoln, primarily the Antelope Valley Project.

Neighborhood Associations: A principle partner with the City in planning and implementation of revitalization projects.

Antelope Valley Partners: The Antelope Valley Project was started in 1996 to resolve transportation, flooding, and community revitalization issues in Lincoln's central core neighborhoods, primarily Malone, Clinton, and the North Bottoms. This study brought together the City, the University of Nebraska-Lincoln, the Lower Platte Natural Resources District, federal agencies, neighborhoods, and the private sector to discuss concerns and identify solutions in this area. Throughout the process, the Urban Development

Department has been actively involved as a member of the Management Committee, the Community Revitalization Advisory Committee, the Citizen's Advisory Committee, and the City Directors Antelope Valley Committee.

Free to Grow: Free to Grow is a neighborhood revitalization program with partners from the private, non-profit and public sectors working together to help develop solutions to problems that contribute to crime, an unhealthy environment, and substandard housing. The group concentrates revitalization efforts in smaller areas within a neighborhood. The program Core Team meets biweekly to keep current on the issues and to ensure action steps are being met.

Stronger Safer Neighborhoods Initiative: On March 13, 2008 Mayor Beutler launched the Stronger Safer Neighborhoods Initiative, a partnership between government, non-profits, schools, neighborhoods, churches, and the business and development community. The program is designed to improve neighborhoods and revitalize problem areas. A Mayoral Aide was hired and assigned to the Lincoln Police Department to head the initiative. Stronger Safer Neighborhoods is a problem oriented policing program. It involves a comprehensive approach that recognized the connections between crime, poverty, blight and social behaviors. It is predicated on a belief that we cannot arrest our way out of these problems. We have to address the underlying conditions in order to create lasting stability, safety, and health.

Community CROPS (Combining Resources, Opportunities and People for Sustainability): The mission statement of this non-profit states: "Community CROPS...helps people work together to grow healthy food and live sustainably." Their vision states: "Lincoln is a community that values all people and where everyone has access to locally grown healthy food. Our community grows together, celebrating life and culture and recognizing our connection to the Earth. Our gardens provide the opportunity to share knowledge, educate, experience personal growth, and provide green spaces for mental, spiritual and physical healing and well-being. We are creating a resilient system where people can earn a living by feeding our community and conserve precious resources for future generations." Their website states the following about their history: "Community CROPS was started with one community garden in 2003, and has grown over the years to become a successful organization. CROPS now has sixteen community garden sites, a training farm, a successful Community Supported Agriculture program, a regular stand at the Old Cheney Road Farmers' Market, and more."

Community CROPS is a subrecipient of Urban Development. CDBG funds are being used to assist CROPS in the development of new, and expansion of existing, community gardens, and operations.

Updated 7/11

Introduction

No one can doubt that most American cities these days are deeply troubled places. At the root of the problems are the massive economic shifts that have marked the last two decades. Hundreds of thousands of industrial jobs have either disappeared or moved away from the central city and its neighborhoods. And while many downtown areas have experienced a "renaissance," the jobs created there are different from those that once sustained neighborhoods ... Either these new jobs are highly professionalized, and require elaborate education and credentials for entry, or they are routine, low paying service jobs without much of a future. In effect, these shifts in the economy, and particularly the disappearance of decent employment possibilities from low-income neighborhoods, have removed the bottom rung from the fabled American "ladder of opportunity." For many people in older city neighborhoods, new approaches to rebuilding their lives and communities, new openings toward opportunity, are a vital necessity (Kretzman and McKnight 1993, pg. 1).

The former UNL Community Outreach Partnership Center (COPC), of which the University of Nebraska – Lincoln's departments of Sociology, Community and Regional Planning and Agricultural Leadership, Education and Communication were leading members, [worked] to establish community programs aimed at addressing specific neighborhood needs by working together to revitalize neighborhoods, encourage community development, provide needed educational programs and reverse the deteriorating quality of life of the neighborhoods that surround the University of Nebraska Lincoln (UNL CPOC Grant, 1998). One of the COPC projects was to address areas of growing "social isolation," through an asset based development approach (as proposed by Kretzman & McKnight, 1993).

In this same vein, many articles have previously explored various neighborhood development and safety concepts as they relate to a range of variables while only reporting their significance in statistical terms. This can be particularly confusing to neighborhood-based stakeholders in community redevelopment, because few lay residents can understand the meaning of statistical language (r squared or other statistical values). Past research has identified links between neighborhood social composition, disorder, crime and violence. However, newer research suggests that crime is not solely attributed to individuals' aggregate demographic characteristic, "rather crime is a function of social and organizational characteristics" (Sampson & Raudenbush, 1997 pg.2).

Within the context of the COPC project, the Everett Neighborhood was targeted. The neighborhood selected through the use of antidotal stories, criminal patterns, and 2000 US Census reports. However, the need to rate/predict where resources and effort should be placed, sustained or moved ought to be not only defined and easily communicable but also broadly defensible. With this in mind I found Robert Sutherlands Differential Association Theory, which predates most of the work cited thus far, interesting because of the seemingly 'common sense' tenet that the more negative definitions an individual experiences the more likely they are to commit deviant behavior. While some components are broad and undefined, it's a concept that many can relate to. Therefore this paper will examine Dr. Edwin H Sutherlands Differential Association Theory as how it relates to neighborhood development.

To be clear, the purpose of this paper is to review Dr. Sutherlands Differential Association Theory and select criticisms, with the intent of communicating/operationalizing his theory using data sources common to the City of Lincoln Nebraska, within the context of neighborhood redevelopment. Next, a brief overview / visual analysis of the results will follow and finally, I will conclude with a brief discussion and closing comments.

Literature Review and Select Criticism

Differential Association Theory was Sutherland's major sociological contribution to criminology; similar in importance to strain theory and social control theory. These theories all explain deviance in terms of the individual's social relationships (FSU & Whitt, 2009). "[Sutherland] rejected biological determinism and the extreme individualism of psychiatry, as well as economic explanations of crime. His search for an alternative understanding of crime led to the development of Differential Association Theory. In contrast to both classical and biological theories, Differential Association Theory poses no obvious threats to the humane treatment of those identified as criminals."(Gaylord, 1988:1)

The postulates of differential association asserts that a person becomes delinquent/deviant because of an "excess" of definitions favorable to violation of law over definitions unfavorable to violation of law which is stated in postulate #6 below. In other words, "... criminal behavior emerges when one is exposed to more social message favoring [negative] conduct than pro-social [conduct] (Sutherland, 1947). "Sutherland also argued that the concept of differential association and differential social organization could be applied to the individual level and to aggregation [or group] level respectively.

The first explicit statement of the theory of differential association appeared in the 1939 edition of *Principles of Criminology* and in the fourth edition of it, he presented his final theory. His theory has nine basic postulates (FSU, & Sutherland, 1974: 75-76).

1. Criminal behavior is learned.
2. Criminal behavior is learned in interaction with other persons in a process of communication. (Includes both Verbal & Non-Verbal Communication)
3. The principal part of the learning of criminal behavior occurs within intimate personal groups. (Excludes movies, newspapers ETC, Maybe because those can be controlled)
4. When criminal behavior is learned, the learning includes (a) techniques of committing the crime, which are sometimes very simple; (b) the specific direction of motives, drives, rationalizations, and attitudes.
5. The specific direction of the motives and drives is learned from definitions of the legal codes as favorable or unfavorable. (Problems among cultural differences are important)
6. A person becomes delinquent because of an excess of definitions favorable to violation of law over definitions unfavorable to violation of law.

This is the heart of differential association. When people become deviant, they do so not only because of contacts with criminal patterns (direct and indirect) but also because of isolation from positive patterns.

7. Differential association may vary in frequency, duration, priority, and intensity.
 - a. Frequency is how often you interact with the other person
 - b. Duration is how long you have known the other person
 - c. Priority has to do with when in your life you have the relationship
 - d. Intensity consists of (a) your emotional relationship with the other person and (b) that person's prestige in your eyes
8. The process of learning criminal behavior by association with criminal and anti-criminal patterns involves all of the mechanisms that are involved in any other learning.
9. While criminal behavior is an expression of general needs and values, it is not explained by those general needs and values since non-criminal behavior is an expression of the same needs and values.

Criticisms

While general in its nature, and due to the same, it has endured criticism and continued praise alike. Reasons for criticism vary. Some argued that criticism often resulted from misinterpretation of Sutherland's theory. For example, just because you live in an area with high prepotencies of negative influences, doesn't automatically make a person bad or deviant. However, others (FSU & Akers, 1996 & Whitt, 2009) would argue that this misinterprets Sutherland's fourth postulates that states criminal behavior is learned through association ... not simply through proximity contact.

Still, there are two major weaknesses to the theory that are generally agreed upon. The first problem is that the concept/term of 'definitions' is not defined, nor is there initial guidance on how to operationalize the ratio or 'excess of definitions'. The second real problem is that it left the learning process unspecified. Did learning have to follow a similar process, or could certain elements 'test-out' of certain levels to advance? Furthermore, (1) how could we predict where and when that learning would occur and (2) How should positive programming be paid for and where should it occur?

According to other critiques differential association and social learning theory ¹rests on the assumption that socialization is completely successful and that cultural variability is unlimited among others (Akers: 1996:229).

Differential association has been subject to a number of other criticisms (Sutherland, 1974: 82).

1. Is defective because it omits consideration of free will
2. Is based on a psychology assuming rational deliberation
3. Ignores the role of the victim
4. Does not explain the origin of crime
5. Does not define terms such as "systematic" and "excess"
6. Does not take "biological factors" into account
7. Is of little or no value to "practical men"
8. Is not comprehensive enough because it is not interdisciplinary
9. Is not allied closely enough with more general sociological theory and research
10. Is too comprehensive because it applies to noncriminals
11. Assumes that all persons have equal access to criminal and anticriminal behavior patterns

In sum, I believe other critics have correctly identified 'measurement problems' as the greatest hurdle to operationalizing Sutherland's theory when Pfohl wrote, "The likelihood of deviant behavior could be determined by calculating the difference between favorable and unfavorable associations. Yet, as Sutherland recognized, the development of such a formula would be extremely difficult. Although the importance of associations is obviously influenced by such factors, the factors themselves are difficult to reliably measure in any standardized fashion." (Pfohl, 1994:303) He echoed (Matsueda, 1988: 296) when he wrote, "Perhaps the most fundamental research problem involves identifying the content of definitions favorable to crime".

My personal criticisms of the theory are fairly simple. They echo other known criticism but offer more insight, given my background (i.e Urban Planner, and Geographic Information System Analyst - GIS).

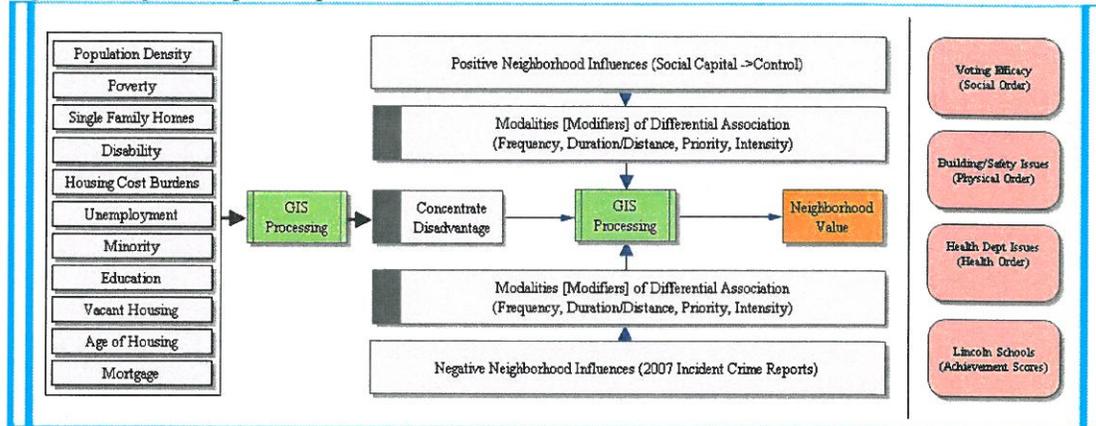
1. The theory is difficult because It has no defined beginning or end.
2. The theory, I believe, assumes that all crimes impact "definition" and "operationalization" regardless of the spatial location. For example, does check forgery in a business district directly impact a bully in grade school?
3. It assumes all behavior (criminal) is relevant regardless of the classified outcome. For examples does a larceny from auto enable/teach a person to become a rapist?

Modeling Differential Association

It's assumed that its hard to model Differential Association Theory. On the other hand, I question the use of 'hard' – because (1) NOT knowing what positives and negatives should be considered, (2) unknown definitions, (3) the vagueness (when communicating the inputs and outputs) for lay individuals is of concern and (4) not having a starting point from which to base an analysis LEADS to the FREEDOM to place context within each section of the theory. Therefore below is a simple model that I will use, via GIS, to operationalize this theory for further examination. See figure 1 below

¹ Not directly covered in this project

Figure 1: Projects Proposed Operationalized Model and Process



Model Description

This project identified and recognized alike that into order to operationalize Sutherlands Differential Association Theory a starting and end point was needed to standardize a process of capturing a snapshot of an area within the context of available data sources. To begin, note that the entire model is self contained within its own process. This was done intentionally to provide broad interpretation/application to terms (defined and undefined) within the theory. Next, moving left to right, US Census Data was processed (both in numeric's and format) in a Geographic Information System (GIS)² to produce a raster image which depicts the level of concentrated disadvantage. Using each raster cell's individual value in conjunction with positive and negative externalities, which were modified through modalities and additional GIS processing thereby cell values depicting the likely hood of neighborhood distress and/or disorder are created.

The four rose boxes on the right; voting efficacy, building and safety issues, health department issues and student achievement scores are variables that may be able to explain the validity of the model. However, and again, this project only completes an initial visual analysis.

Concentrated Disadvantage

Studies of crime and disorder have traditionally emphasized structural dimensions of an economic nature primarily concentrated on poverty and its concomitant lack of social resources (Sampson & Raudenbush, 1999 pg. 609). Areas of concentrated disadvantage are poor neighborhoods that concentrate not only low incomes, but also high unemployment, financial dependence and institutional disinvestment (Hager & Peterson, 1995). These areas of concentrated disadvantage find it difficult to support viable commercial enterprises, promote housing investment, locate employment opportunities, and have access to services and communal assets (Sampson & Raudenbush, 1999). However, structural constraints affecting areas of concentrated disadvantage are not just of an economic nature or of a limited material circumstance. An ecological human aspect is also of importance. This includes social networks, residential instability, public transportation nodes, population density and non-residential land use. Social networks examine the number of connections (e.g. friends, family) and how a person interacts with them. Residential instability is important because it may signal a lack of attachment to the general neighborhood and may point to low involvement.

Because concentrated disadvantage is both physical and social in nature it lends it self to be a good starting point for a Differential Association Theory. Additionally, a concentrated disadvantaged scale can be interrupted in both positive and negative contexts (i.e. if an area has a value of five on a scale of one to ten, its worth is both positive and negative). Again, this duality lends its self nicely to the operationalizing of differential association.

² GIS, Geographic Information System. More on GIS is covered in later sections

Positive Externalities

Numerous externalities could be applied to demonstrate the 'good' that promotes different learning processes within groups. However, because this project focuses on the neighborhood context, I focused my efforts on defining/using common data source that many communities would have access to. Those data sources should reference at some level concepts such as social control/capital³ and collective efficacy. Because, Sutherland's theory doesn't define 'positive' there is latitude to its application. However, this project believes that his theory works best within small aggregation groups and at the individual and parcel level.

Social Control via Social Capital

Social control is the desire to live "free of ... disorder" (Sampson & Raudenbush, 1999 pg. 611) which spurs the type of action/capacity a "social unit needs to regulate itself according to mutually desired goals" (Sampson & Raudenbush, 1999 pg. 610). Social control via capital (a resource) is exerted in two forms. The first, formal control, takes the form of an externally induced action by formal community organizations such as the police department (police crackdowns), urban development (housing, code enforcement) and the health department (trash, weeds), schools (student achievement) and voting (individual efficacy) The second is localized informal control by informal community action such as individual efficacy (the willingness of residents to intervene, civic participation) and neighborhood efficacy (shared cohesion, shared expectations) which requires neighbors working to build the collective efficacy of an area through effort, in an endeavor to limit negative behaviors, (e.g. street corner harassment, loitering, fighting) and enhance their willingness to initiate or achieve social control through the creation of relational connections between family, neighborhood members and public groups.

Collective Efficacy

A long line of urban research suggests that participation in social exchange, friend/kinship ties, and affective identification with the local area increases mutual trust and shared expectations for collective action in support of the neighborhood (Sampson, 1988). Thus, collective efficacy is comprised of individual efficacy (e.g. willingness of residents to intervene in daily life, civic participation) and neighborhood efficacy (e.g. neighborhood social cohesion, shared expectations). Collective efficacy is the defining aggregate characteristic of informal control which is defined as the creation of "cohesion among residents with shared expectations for the social control of public spaces" (Sampson & Raudenbush, 1999 pg. 603).

Negative Externalities

Past efforts have reported that the type of crime relevant to perceptions of neighborhood safety is predatory and neighborhood crime (e.g. robbery, assault, murder, rape, gangs, location of sex offenders ... etc). This kind of crime is interesting, because "[it] builds on the insight that it involves the intersection in time and space of motivated offenders, suitable targets, and the absence of capable guardians [active citizens]" (Sampson & Raudenbush, 1999 pg.610). With respect to the issue at hand, differential association, it would make sense to assume if an area, or persons in an area knew (1) criminal activity was occurring, (2) people were getting away with it, (4) distress/disorder is evident and (5) it appears that neighbors aren't involve that YES an indirect learning and teaching process is occurring⁴. It may not be as efficient as direct communication, but the physical state of a neighborhood along with criminal argot roles (i.e. story telling), still follows Sutherlands fourth and fifth postulates. Again, because Sutherland did not define 'negative' this project references others work and selects neighborhood crime as its measure, because crime information is point based, objective, documented and easy to manipulate.

Neighborhood Value

Reaching back, and seizing criticisms of Sutherlands theory this project recognizes that operationalization of differential association is tough. However, it also recognizes that when theory is placed into purpose, communication of concepts is achievable. Therefore this projects end product is a raster image with cells that have independent values derived from Sutherlands theory based on best effort

³ Social resources

⁴ These five 'knowns' echo Sampson and Raudenbush's Broken Windows Theory

definitions, data sources and processes. Finally, while the name implicitly implies worth, the intended use of 'value' in this context is for comparison between areas in an economic fashion.

Communicating the Model

With the model identified and described, how does one best communicate this knowledge so that stakeholders and the public may become engaged in positive dialog? The answer is to first find data to represent and illustrate the components of the model: neighborhood crime levels, levels of manifested deprivation, incidents of disorder and incidents of social efficacy. Second, by depicting the components of the model in a geographic information system, i.e., mapping the: crime, disorder, concentrated disadvantage and social control of for city of Lincoln, Nebraska. The selected information⁵ must serve a dual purpose. The data must be more than a table of numbers; it must be information that can be manifested through geography to a physical location (point), area (shape) or path (line) in a geographic information system (GIS), and it must be readily available. With data of this nature a simplified form of operationalization, analysis and communication of Sutherland's theory is achieved.

GIS and Neighborhood Values

"The purpose of GIS, regardless of specific application, is ultimately to tell a story or relay a message about a place in time. Logical applications as well as unforeseen benefits of GIS are becoming popular topics of discussion" (Colwell, 2004 pg. 5) Numerous agencies have adopted GIS for improving methods of crime forecasting, trend analysis, information sharing, quality of life assessment, and decision making (Casady, 2003; Heywood et al., 1992).

Graphically displayed data can persuade an audience to believe in a state of affairs that may or may not exist (Canter 1998). Due to the especially persuasive nature of GIS, the capability to rapidly generate maps and reports comes with the responsibility of understanding what is being generated and what purpose will be served by the resulting information (Piper, 2002). This section will address how GIS can be used in Differential Association Theory analysis. Included in this discussion will be some of the advancements GIS has contributed to in the spatial analysis of crime and social capital, resources and control.

"One of the ways in which ... analysts use GIS is to generate, analyze, and distribute ... statistics [and maps] about neighborhood [order]" (Colwell, 2004 pg. 5). "The aim is to keep law [code] enforcement personnel, public administrators, and citizens abreast of the state of the environment in which they work and reside" (Casady, 2003; City of Beaverton Oregon, 2003). From helping to maintain it, to initiating security, education or employment programs, to willingly committing neighborhood resources to ensure the health of it, active, engaged residents can become the neighborhood's biggest assets and defenders.

With the exception of Colwell (2004), and the participating cities involved with the National Neighborhood Indicator Partnership, previous research and projects done concerning neighborhood analysis is lacking in the ability to visually communicate a clear message. As stated before, many authors have only reported their findings in statistical terms, which can be hard for many lay politicians, residents and activists to fully comprehend. *This study will shadow Colwell (2004), who had examined the macro quality of life for the city of Lincoln through the use of GIS in an attempt to spatially display Sutherland's Differential Association Theory which may encourage local engagement and promote activism in local residents and politicians.*

GIS software offers a vast number of tools that promote the understanding of the spatial relationships that exist among data (Luc, Cohen, Cook, Gorr & Tita; 2000). Advancing applications in GIS have greatly encouraged the development of spatial algorithms for use in data analysis, many of which are applicable in neighborhood safety analysis. It is recognized that crime occurrence is not random. In fact, distribution of criminal activity, [disorder locations]/socially undesirable behavior is often found in spatially concentrated pools (Luc et al., 2000; Brantingham, 1986). As a result, the processes most applicable to this study include work done on point pattern, cluster and hotspot analysis. Point pattern analysis is largely concerned with identifying the randomness of point distribution across space. Data is often assessed by determining the presence of clusters or dispersion of points, in comparison to a random

⁵ This information could be indicators or other benchmark data

distribution of those points across the same surface (Luc et al., 2000; McLafferty et al. 2000). “Cluster analysis evolved into what is now commonly referred to as hotspot analysis. Hotspot analysis provides a means of interpreting large amounts of point data across a surface. Hotspots are commonly assessed in one of two ways. The first is to aggregate the information into boundaries such as neighborhoods, blocks or census tracts, often resulting in the production of tables, bar charts and choropleth maps.” (Colwell, 2004 pg. 6) The second method of representation, which is the method that will be used in this project, diminishes the boundary issues associated with point aggregation. In this method, a grid-based surface is created to display the hotspots of crime over an uninterrupted surface. This type of hotspot analysis estimates the location and density of events with finer precision than aggregating point data [into a raster grid format] (McLafferty et al., 2000). “If used with caution, GIS may help uncover clues about why certain ... trends and hotspots occur” (Colwell, 2004 pg. 7).

Upon review, indicators (for concentrated disadvantage, negative and positive externalities) that were used in other studies and communities were narrowed into a list that could be applied within the city of Lincoln, Nebraska. Information used for the final indicator and benchmark selection is based on two criteria. First, that the data be readily available, and second that the information can be used in a GIS. A table listing each indicator, rank, priority and /or measurement or method can be found in appendix B.

Concentrated Disadvantage

Distress [leading to concentrated disadvantage] doesn't just happen overnight; instead, it's a process of community deterioration resulting from the impact that current levels of socio-economic indicators have on the social and physical form of a community. In general, a distressed area may exist where residents and associations that have the desire to reverse the downward trend are unable to because they lack the financial resources, expertise, coordination of efforts, time, and/or leadership skills necessary to significantly document needs and devise programs to address those needs which would ultimately improve their neighborhood safety and quality of life. (UNL COPC Grant, 1998) Therefore distress (Katz, 2004) is a grouping of indicators (UNL COPC Grant, 1998; Berube, 2005), whose negative effects, can define an area as unfavorable.

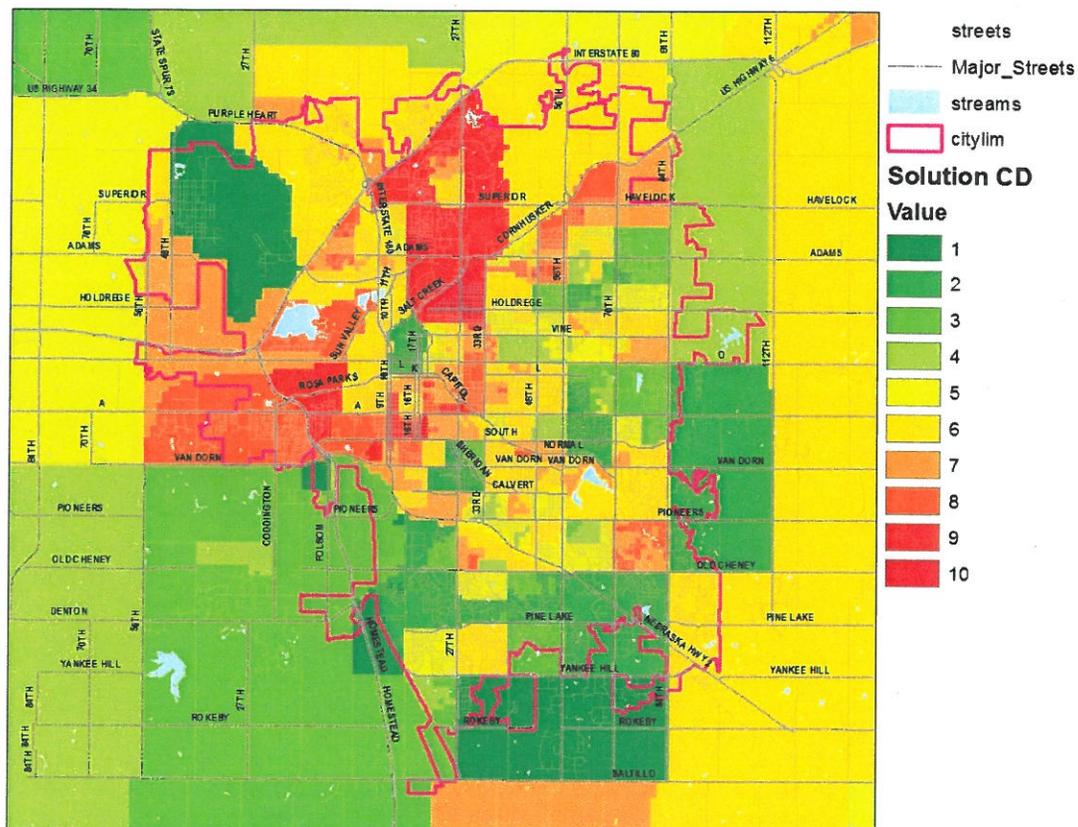
A common question is, ‘what are the indicators that I should use in my community?’ The simple answer is that there is no one best list. Instead, communities need to come together and decide what information will detail their community. They can then collect, manage, process and propagate compiled information to citizens, activists and politicians to aid in the development of a comprehensive community initiative. Therefore, after a review of relevant literature (Haque, 1998; Berube & Katz, 2005; Sawicki & Flynn, 1996) the project selected eleven socio-economic indicators (see table one).

Table 1:
Lincoln's Distress Indicators, when geo-processed results in Concentrated Disadvantage Values

Concentrated Disadvantage		
Indicator	Definition	Data Source
Population	Population	Block Group
Poverty	Individuals below poverty	Census Tract
Single Family Homes	Number of own children (18 and under) on single-parent families	Block Group
Disability	Number of individuals (age 21 to 64) with a disability	APA
Housing Cost Burdens	Number of rental households paying at least 30% of their income for rent	Census Tract
Unemployment	Number of adult (25-64) civilian labor force that is unemployed	Census Tract
Minority	Population that is a minority	Block Group
Education	Number of persons (25+) with less than 12 grade education	Census Tract
Vacant Housing	Number of vacant housing units	Block Group
Housing Built before 1939	Number of housing units built before 1939	Census Tract
Mortgages	Number of housing units with a mortgage	Census Tract

To determine where troubled areas exist in Lincoln this project created an index of concentrated disadvantage with census data from the smallest possible geography⁶. It then joined data with the corresponding geography polygons in a GIS. This index will measure distress on a 1-10 scale (one being no distress and one being the most distressed). To form a ranking this study normalized each indicator with its census geography's area (acres). The normalized values were divided by the largest value per factor to create an impact scale from 0-1. Next, each indicator was converted to a raster. Through the use of a raster calculator, common in most GIS, impact values of each indicator were summed together and reclassified into values from 1 to 10. Finally, this raster was divided into ten equal interval classes thereby displaying the location of Lincoln's distressed areas in an easily understood and communicable format.

Image 1: Areas of Concentrated Disadvantage



Negative/Positive Externalities and Modality Modification

The externalities used within this study conform to the purpose from which this project began. That being, how does Differential Association Theory relate to neighborhood development and deviant behavior? Due to the lack of definitions, this project chooses to use those incidents that the Lincoln Police Department chief of police selected as crimes that impact neighborhood development as negative indicators (See table two below). Positive factors that have been used in a past conference presentations (Nam & Elder, 2008)⁷ will serve as the positive indicators. (See table three below.)

⁶ The census has different aggregation levels. Check www.census.gov to learn more that them

⁷ Conference presentation August 2008, Chicago II

Table 2: Negative Externalities: Neighborhood Crime Types

Negative Externalities: Neighborhood Crime Types					
Impact	Call	Type	Count	Impact Distance	Buffer Distance
10	ASLT GUN	Assault-Gun	188	4	1200
10	ASLT KNIFE	Assault-Knife	430	5	1500
8	ASLT ODW	Assault-Other dang weapon	816	3	900
7	ASLT NO WEAP	Assault-No weapon	9932	5	1500
7	BURG RD FE	Residential Dwelling-Forced Entry	438	5	1500
7	BURG RN FE	Forced Entry	277	5	1500
7	BURG RU FE	Residential Unit-Forced Entry	1025	5	1500
7	SELL NARCO	Narcotics-Sell	245	7	2100
6	ASLT PO/KNIF	Assault-Pulled-Knife	1	6	1800
6	ASLT PO/ODW	Assault-Pulled-Other dang weapon	11	6	1800
6	LFA \$1-49	Larceny from Auto	1330	1	300
6	LFA \$50-199	Larceny from Auto	1236	1	300
6	LFA \$200+	Larceny from Auto	1431	1	300
5	BURG RD NFE	Residential Dwelling-Non Forced Entry	258	3	900
5	BURG RN NFE	Non Forced Entry	319	5	1500
5	BURG RU NFE	Residential Unit-Non Forced Entry	764	3	900
4	DISTURBANCE	Disturbance	7237	2	600
4	LAA \$1-49	Larceny Auto Access	775	2	600
4	LAA \$50-199	Larceny Auto Access	836	2	600
4	LAA \$200+	Larceny Auto Access	858	2	600
4	LFA ATTEMPT	Larceny from Auto-Attempted	1014	1	300
3	BURG RD ATT	Residential Dwelling-Attempt	84	5	1500
3	BURG RN ATT	Residential Unit of some sort	111	5	1500
3	BURG RU ATT	Residential Unit-Attempt	227	5	1500
3	NARCO-OTH	Narcotics-Other	218	3	900
2	LAA ATTEMPT	Larceny Auto Access-Attempted	84	2	600
2	POSS NARCO	Narcotics-Possession	3586	1	300
1	ASLT PO/N WP	Assault-Pulled Non Dang Weapon	81	6	1800

Table 3: Positive Externalities: Neighborhood Social Resources

Negative Externalities: Neighborhood Crime Types					
Intensity	Type		Count	Impact Distance	Buffer Distance
10	Grt_Neigh	Great Neighborhood Graduates	86	2	600
7	COORD	Neighborhood Coordinator	1005	5	1500
7	NA_Pres	Neighborhood Association Presidents	47	10	3000
6	NW_Members	Neighborhood Watch Members	13778	2	600
4	Poll_Worker	Election Poll Worker	1074	1	300
3	CommFac	Community Facilities	22	8	2400

Furthermore this study, through the use of GIS processing, recognizes that not all crime and social capital (a resource) are equal. Because Sutherland was vague the project sought creditable advice from select personal in the city of Lincoln's Urban Development department, Neighbor Works (Part of NeighborWorks America) and various community activists about how those crimes should be interrupted

and operationalized. In general, an initial list with reasonable ranking was developed and modified with each contacts input. Also, of importance crimes that were committed at certain locations were omitted (i.e. hospital, jails, major commercial centers etc)⁸ as crimes they would rarely impact perceived neighborhood safety. Each rater/contact had the right to comment on each variable by proposing a priority (1-10 – low to high) rank in comparison to the others & effect on neighborhood development. Furthermore, they were each asked to specify an impact distance that each crime or social resource would have⁹. This project asked each reviewer if 'x' happened - how far away from it would you need to be to not feel impacted by it. Disturbances (i.e. family feuds, parties or public quarrels etc) depending on the intensity could create a huge impact or reversely almost none. Neighborhood watch members, depending on the concentration (house address) will impact an area differently. In the end the priority ranks and impact areas are subjective but a decent starting location.

The Process for both Externalities

1. The GIS system created an area for each point from the duration/distance value. This is [Value A]
2. All the point values within this area are aggregated according to its impact. This results in [Value B]¹⁰
3. Next a raster version of the frequency (counts of crime per census block) is added to [Value B] ... thereby creating [Value C]¹¹
4. [Value C] is multiple by the value from a resampled density map¹² creating [Value D]
5. [Value E]¹³ is multiplied by the Concentrated Disadvantage¹⁴ value, and reclassified creating [Value F]

Final results were raster images, with values assigned, via GIS processing, to 500*500 foot cells.

Neighborhood Values

Negative externalities were subtracted from positive externalities. This output was not reclassified. Each cell value, within the concept of Differential Association Theory, represents the likely hood of persons to directly or indirectly learn about deviant behavior and social norms. The results vary from negative nine to positive nine (i.e. poor to great). Additionally, these values can be used as a rough indicator value for neighborhood classification and resource targeting.

Results and Analysis/Discussion

A quick visual analysis shows that those areas with the greatest negative values are within the core of Lincoln which surrounds its downtown business district and the University of Nebraska's City Campus (See image two). On the other end of the scale are areas of high positive values. These areas of high values are not widespread instead they are clustered primarily around large scale retirement developments. Those areas that are positive (greater than zero) dominate a majority of the city's space ... however this 'pretty' image is slightly unclear. It is unclear because an observer would not be able to determine the statistical or practical significance of the information/map. Questions such as what's the mean, what's standard deviation or where should we place limited resources have no clear answers.

⁸ 39,649 Crime data points were pulled for the year 2007, of those 12,737 were selected as neighborhood crime types. 16,012 Social resource points were used in this project

⁹ Also, keep in mind that no text analysis of police reports was used prioritize ranks.

¹⁰ This data will be converted to a raster with cell sizes roughly equal to the size of city blocks and resample into 10 equal segments

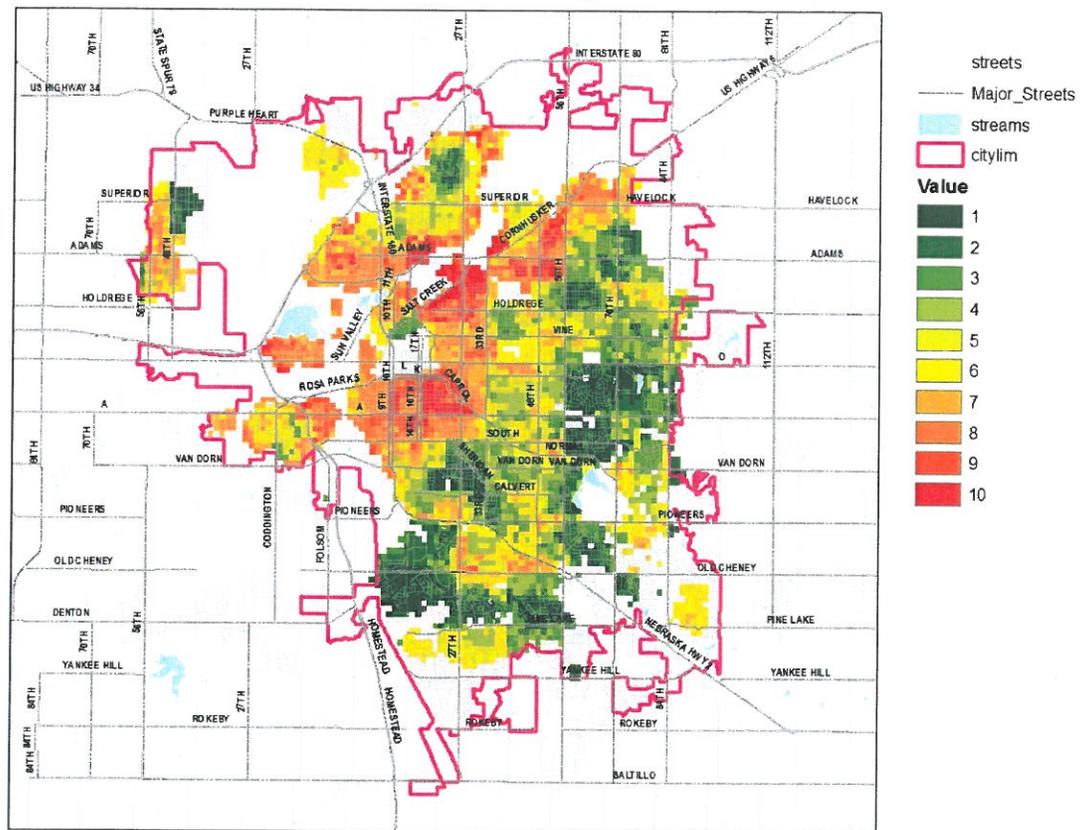
¹¹ Again this data set is resampled into 10 equal segments

¹² Kernel density, 1500 foot search radius – Impact values did not weight the output

¹³ Again this data set is resampled into 10 equal segments

¹⁴ Depending on the externality the concentrated disadvantage value was reciprocated.

Image 2: Operationalized Differential Association Theory



Therefore, the raster data needs to be symbolized according to a standard deviation analysis. For some contextual background remember that each analysis cell is 500*500 feet. A breakdown of cell counts by value is found in appendix B, table 4. Image three shows the breakdown of the cell vales using one standard deviation. For clarity image four displays the data breaks (7), mean (3), standard deviation (2) and other information.

Image 3: Statistical Operationalized Differential Association Theory: Standard Deviation

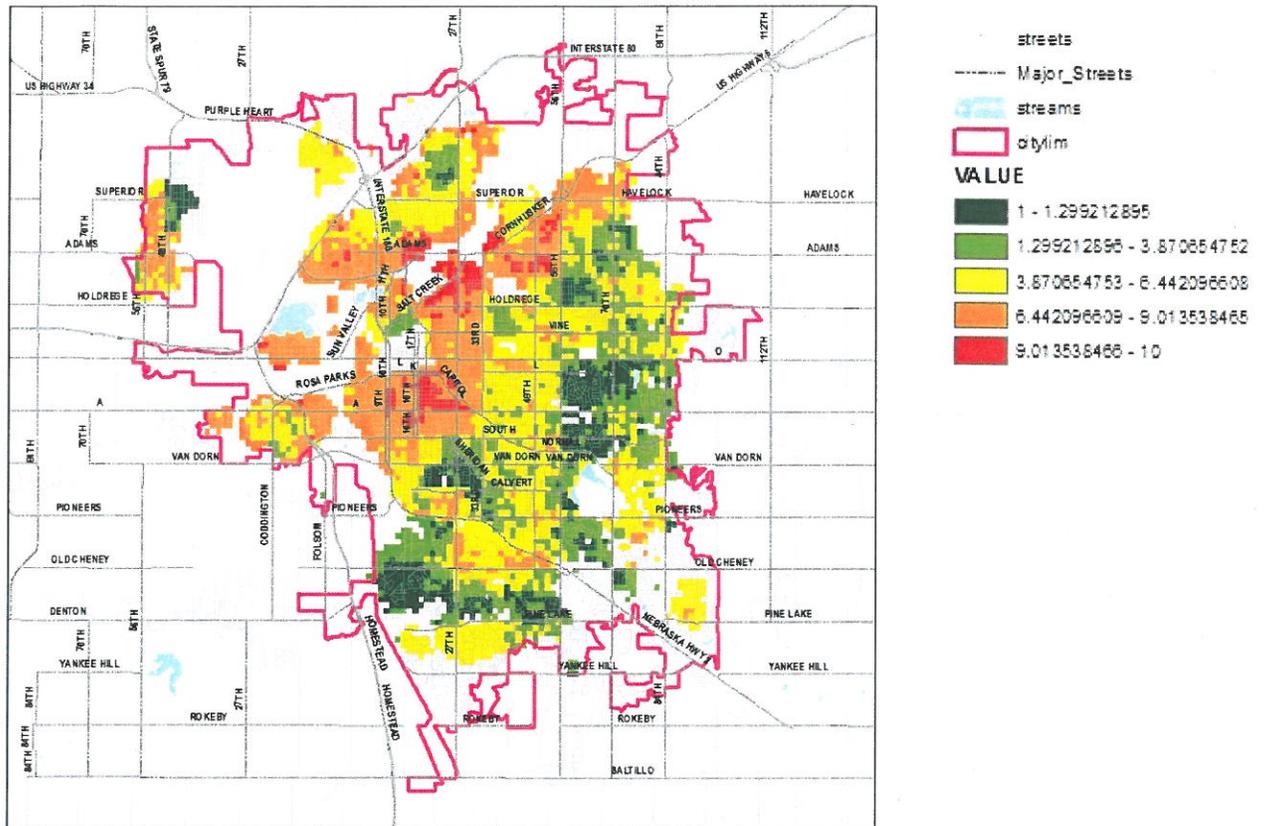


Image 4: Basic Statistical Breakdown

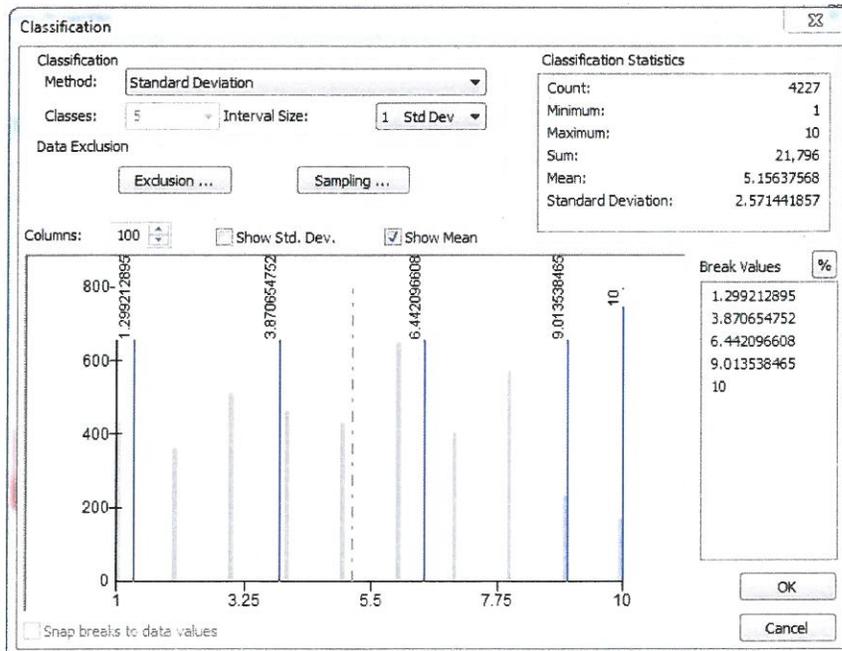


Image three is interesting because it heavily mirrors the initial concentrated disadvantage datasets. Perhaps this isn't an error, but instead a reaffirmation of what is commonly assumed about personal priority according to Maslow's Hierarchy of need. In general, Maslow's hierarchy of needs is predetermined in order of importance. It is often depicted as a pyramid consisting of five levels: the lowest level is associated with physiological needs, while the uppermost level is associated with self-actualization needs, particularly those related to identity and purpose. The higher needs in this hierarchy only come into focus when the lower needs in the pyramid are met. Once an individual has moved upwards to the next level, needs in the lower level will no longer be prioritized. If a lower set of needs is no longer being met, the individual will temporarily re-prioritize those needs by focusing attention on the unfulfilled needs, but will not permanently regress to the lower level (Shane Hudson , 2009). The areas below the standard deviation, and signified as such, contain many working poor, and those whose priorities are not neighborhood first. Instead, work, income and family dominate their resources. Its easy to see how those areas are symbolized the way that they are.

The real test comes down to application and how 'true/significant' these values are to other variables such as voting efficacy, building and safety issues, health department issues and student achievement score ... all of which were depicted in the projects proposed operationalized theory and process figure (figure 1). Unfortunately that is outside of this project, but would be very interesting if those data sets were assembled. Still, the validity of this project and the general context of differential association's impact on neighborhood development is clear; Through the use of a broad theory, community specific indicators can be identified, gather, processed and communicated in a visual form that aids comprehension, rational policy development and defensible, efficient, equitable resource/program distribution.

In conclusion this project examined how Differential Association Theory could be operationalized and applied within the context of neighborhood development and redevelopment. It succeeds in its purpose. However, policy and quality data driven processes are only as strong as the political leadership to place and commit dedicated resources to (1) identified areas or (2) areas where problems can be encapsulated. Communities are dynamic structures that require intentional support and focused intent from not only the community's political processes, but from its citizens as well. I hope that the former will be able to use this project as a guide for leading the ladder through budget and policy/program creation and implementation.

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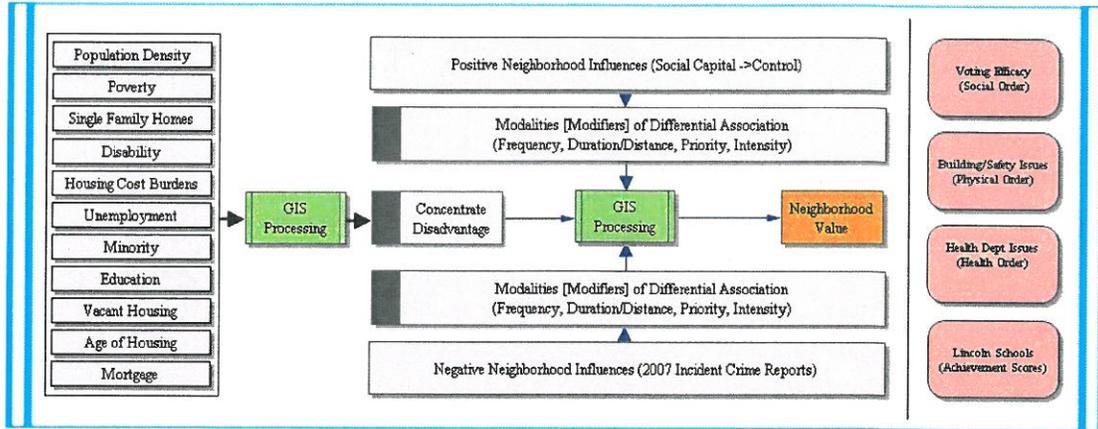
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UNL COPC Grant, 1998

Appendix A: Figures

Figure 1:
Projects Proposed Operationalized Model and Process



Appendix B: Tables

Table 1:
Lincoln's Distress Indicators, when geo-processed results in Concentrated Disadvantage Values

Concentrated Disadvantage		
Indicator	Definition	Data Source
Population	Population	Block Group
Poverty	Individuals below poverty	Census Tract
Single Family Homes	Number of own children (18 and under) on single-parent families	Block Group
Disability	Number of individuals (age 21 to 64) with a disability	APA
Housing Cost Burdens	Number of rental households paying at least 30% of their income for rent	Census Tract
Unemployment	Number of adult (25-64) civilian laborforce that is unemployed	Census Tract
Minority	Population that is a minority	Block Group
Education	Number of persons (25+) with less than 12 grade education	Census Tract
Vacant Housing	Number of vacant housing units	Block Group
Housing Built before 1939	Number of housing units built before 1939	Census Tract
Mortgages	Number of housing units with a mortgage	Census Tract

Table 2:
Negative Externalities: Neighborhood Crime Types

Negative Externalities: Neighborhood Crime Types					
Impact	Call	Type	Count	Impact Distance	Buffer Distance
10	AS_T GUN	Assault-Gun	188	4	1200
10	AS_T KNIFE	Assault-Knife	430	5	1500
8	AS_T ODW	Assault-Other dang weapon	816	3	900
7	AS_I NO WEAP	Assault-No weapon	9932	5	1500
7	BURGRDFE	Residential Dwelling-Forced Entry	438	5	1500
7	BURGRNFE	Forced Entry	277	5	1500
7	BURGRUFE	Residential Unit-Forced Entry	1025	5	1500
7	SELLNARCO	Narcotics-Sell	245	7	2100
6	AS_T PO/KNIF	Assault-Pulled-Knife	1	6	1800
6	AS_T PO/ODW	Assault-Pulled-Other dang weapon	11	6	1800
6	LFA \$1-49	Larceny from Auto	1330	1	300
6	LFA \$50-199	Larceny from Auto	1236	1	300
6	LFA \$200+	Larceny from Auto	1431	1	300
5	BURGRDNFE	Residential Dwelling-Non Forced Entry	258	3	900
5	BURGRNFE	Non Forced Entry	319	5	1500
5	BURGRUNFE	Residential Unit-Non Forced Entry	764	3	900
4	DISTURBANCE	Disturbance	7237	2	600
4	LAA \$1-49	Larceny Auto Access	775	2	600
4	LAA \$50-199	Larceny Auto Access	836	2	600
4	LAA \$200+	Larceny Auto Access	858	2	600
4	LFA ATTEMPT	Larceny from Auto-Attempted	1014	1	300
3	BURGRDATT	Residential Dwelling-Attempt	84	5	1500
3	BURGRNATT	Residential Unit of some sort	111	5	1500
3	BURGRUATT	Residential Unit-Attempt	227	5	1500
3	NARCO-OTH	Narcotics-Other	218	3	900
2	LAA ATTEMPT	Larceny Auto Access-Attempted	84	2	600
2	POSSNARCO	Narcotics-Possession	3586	1	300
1	AS_T PO/NWP	Assault-Pulled Non Dang Weapon	81	6	1800

Table 3:
Positive Externalities: Neighborhood Social Resources

Negative Externalities: Neighborhood Crime Types					
Intensity	Type		Count	Impact Distance	Buffer Distance
10	Grt_Neigh	Great Neighborhood Graduates	86	2	600
7	COORD	Neighborhood Coordinator	1005	5	1500
7	NA_Pres	Neighborhood Association Presidents	47	10	3000
6	NW_Members	Neighborhood Watch Members	13778	2	600
4	Poll_Worker	Election Poll Worker	1074	1	300
3	CommFac	Community Facilities	22	8	2400

Table 4:
Raster Cell Break down

Value	Count	SqFt	Acres
-9	6	1,500,000	34.44
-8	2	500,000	11.48
-7	12	3,000,000	68.87
-6	19	4,750,000	109.04
-5	14	3,500,000	80.35
-4	26	6,500,000	149.22
-3	44	11,000,000	252.53
-2	64	16,000,000	367.31
-1	159	39,750,000	912.53
0	244	61,000,000	1,400.37
1	386	96,500,000	2,215.34
2	824	206,000,000	4,729.11
3	1686	421,500,000	9,676.31
4	2680	670,000,000	15,381.08
5	144	36,000,000	826.45
6	37	9,250,000	212.35
7	9	2,250,000	51.65
8	7	1,750,000	40.17
9	3	750,000	17.22

Image 2:
Operationalized Differential Association Theory

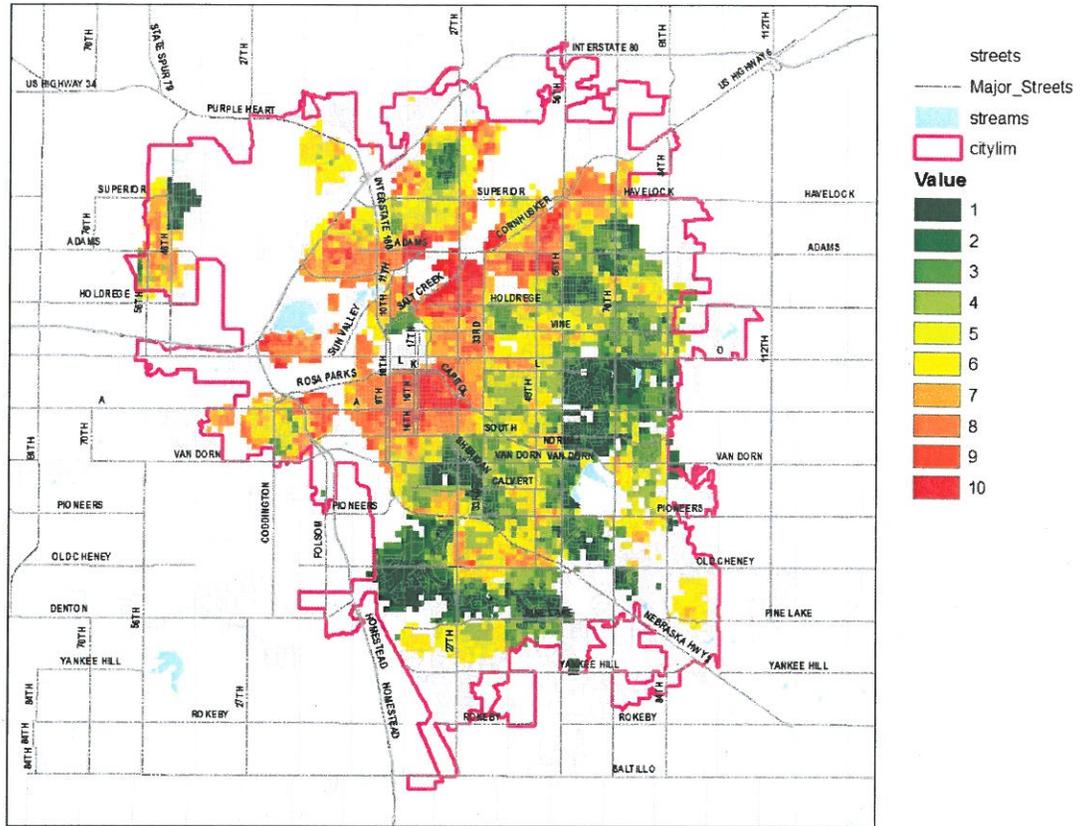


Image 3:
 Statistical Operationalized Differential Association Theory: Standard Deviation

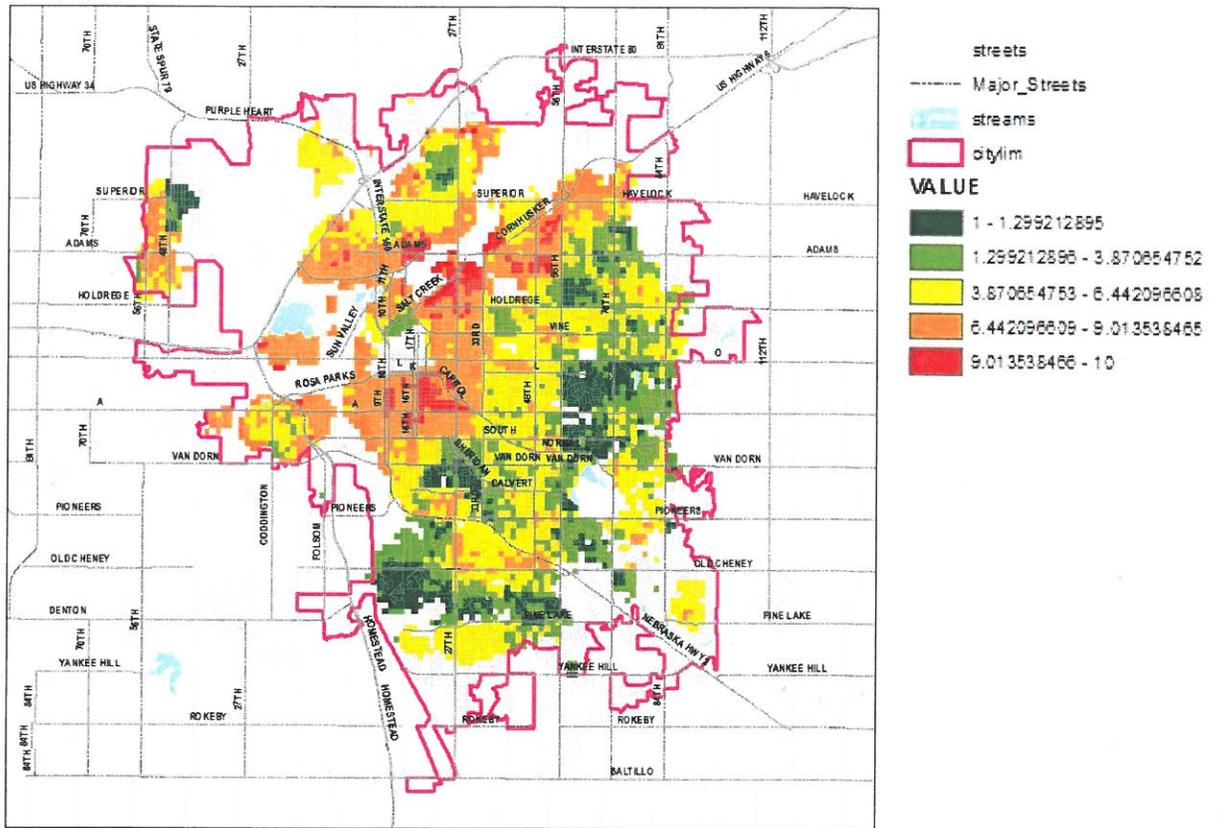
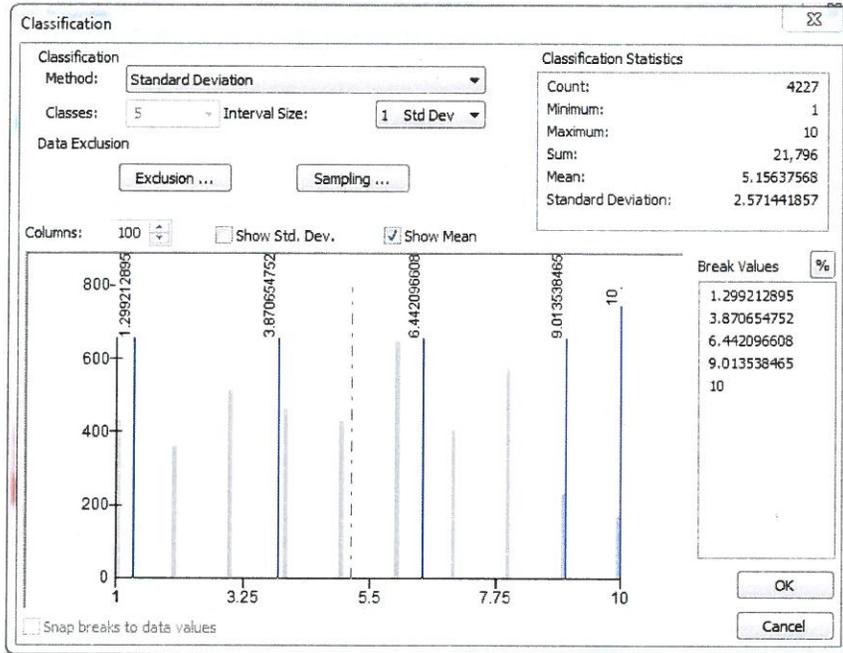
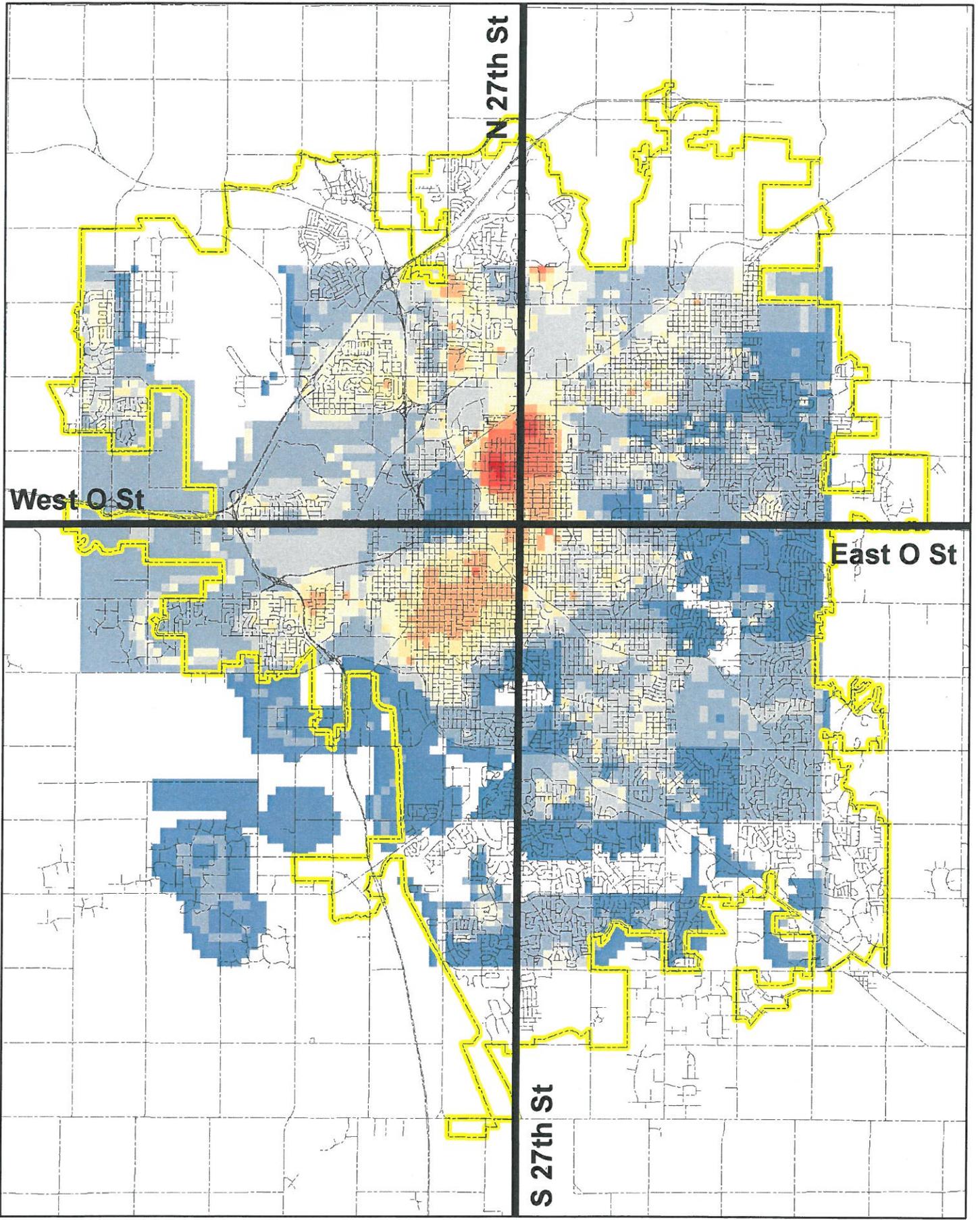


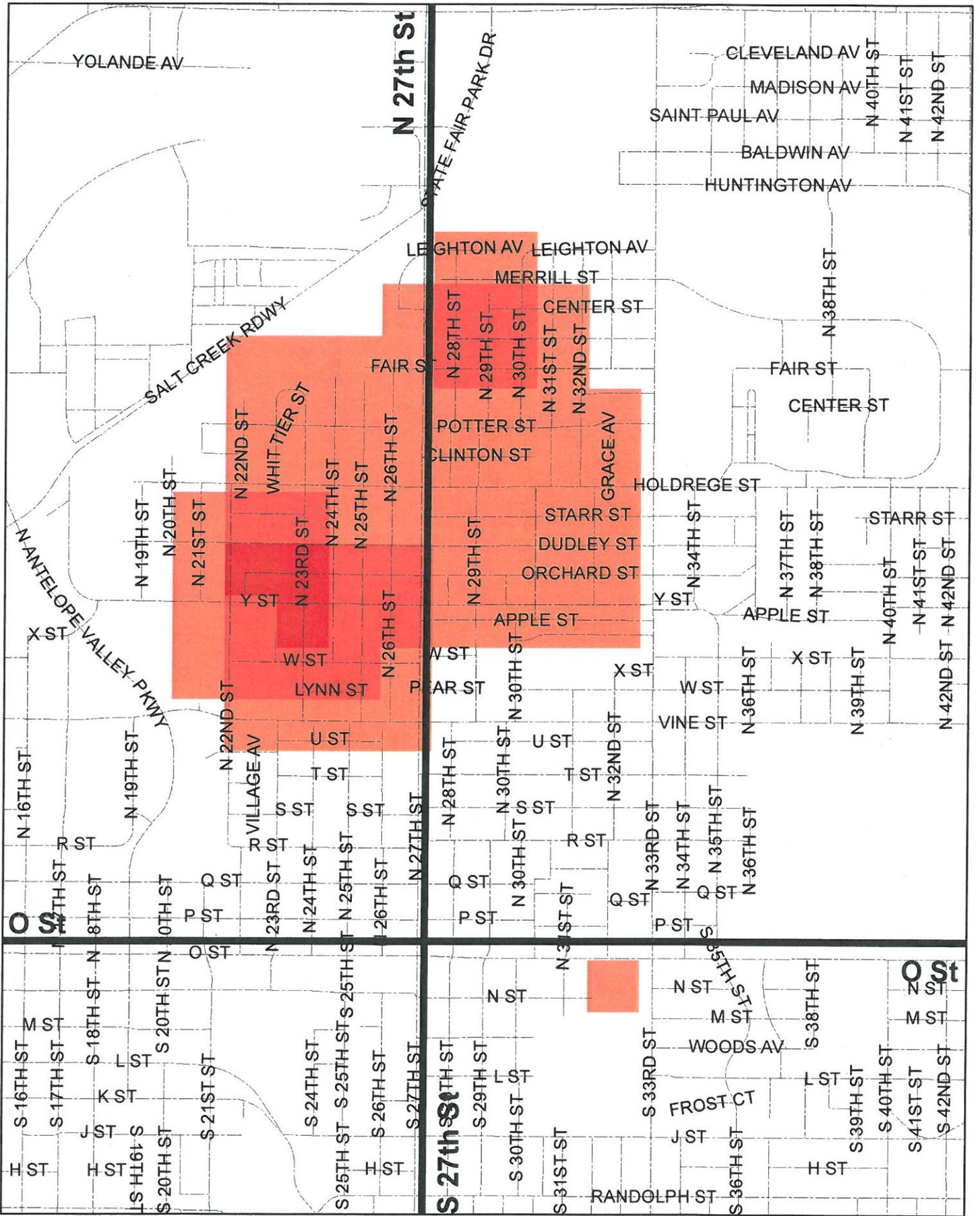
Image 4:
Basic Statistical Breakdown





Concentrated Values





Select Concentrated Values



2012 Summary: Midlands MLS
REALTORS® Association of Lincoln

LINCOLN, NEBRASKA MARKET AREA

OVERALL MARKET ACTIVITY

- At the end of December 2012, there were **1,334** single-family residential homes on the market; 10.2 percent below the number on the market one year ago.
- There were **6,735** new listings processed through the MLS system during 2012; 6.1 percent higher than the number processed one year ago (includes re-listed properties).
- There were a total of **4,164** single-family homes sold through the MLS system during 2012; 18.7 percent higher than the total number sold in 2011 (3,507); and 10.1 percent lower than the total number of record sales in 2004 (4,632).
- The overall median price of a single-family home sold through the MLS system during 2012 was **\$137,800**; 6.0 percent higher than 2011 and 2010 (\$130,000); and a new record high by 2.1 percent since 2005 and 2006 (\$135,000).

EXISTING HOME SALES

- There were **3,655** existing single-family homes sold through the MLS in 2012; up 16.9 percent from 2011 (3,126); and a new record high by 1.6 percent since 2005 (3,599).
- The median sale price of an existing single-family home sold through the MLS was **\$131,000**; 4.8 percent higher than 2008, 2009, 2010 and 2011 (\$125,000); and a new record high by 3.1 percent since 2007 (\$127,000).

NEW HOME SALES

- The number of new, single-family homes sold through the MLS in 2012 (509) was **33.6 percent higher** than the number sold in 2011 (381), and was **53.3 percent lower** than the record number sold in 2003 (1090).
- The median sale price of a new single-family home sold through the MLS in 2012 was **\$196,500**; 3.4 percent higher than 2011 (\$189,950); and a new record high by 0.8 percent since 2006 (\$195,000).

2012 Report: Midlands MLS

REALTORS® Association of Lincoln

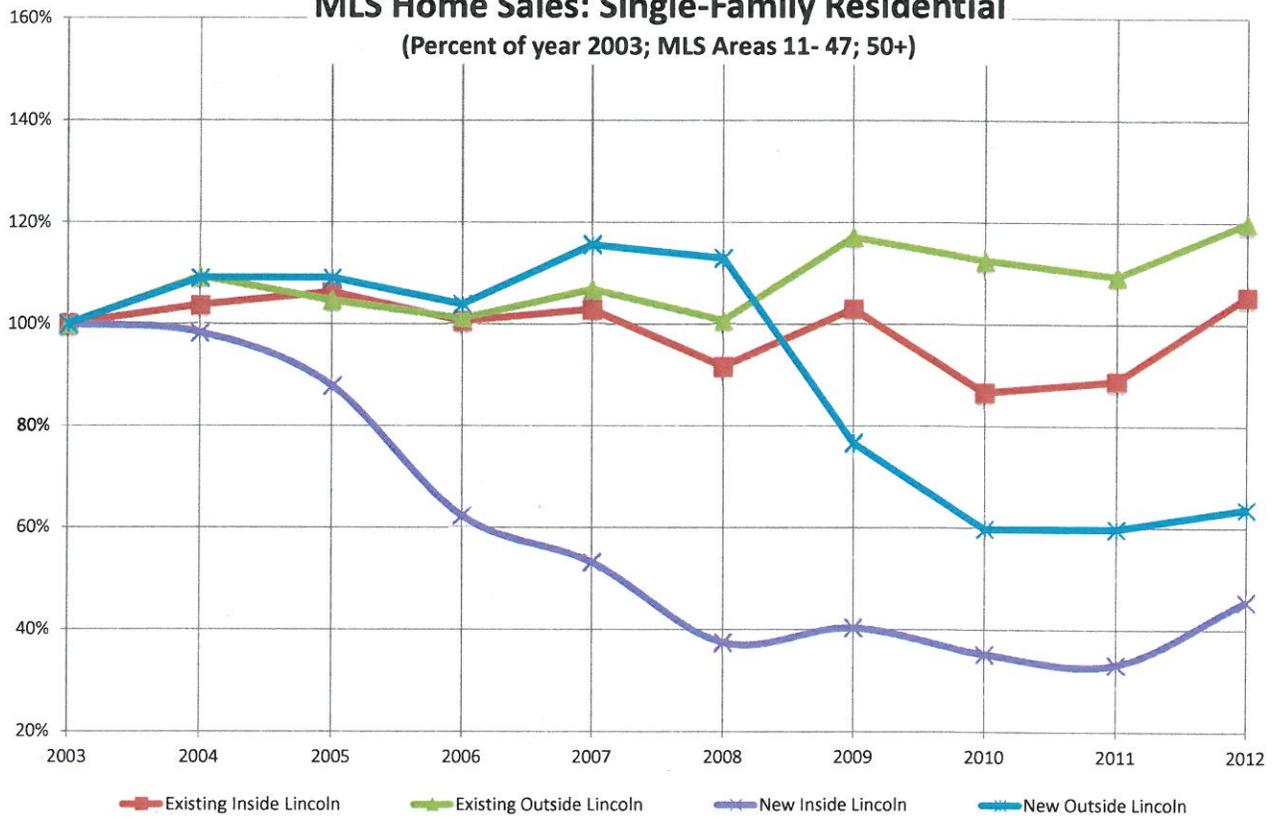
LINCOLN, NEBRASKA MARKET AREA							
	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Single-Family Residential Listings on Market (12/31)	2,052	2,083	2,050	1,672	1,574	1,486	1,334
Single-family residential listings processed	7,681	7,886	7,732	6,895	6,826	6,346	6,735
NEW HOMES							
New home sales closed	711	627	466	467	400	381	509
Median sale price of new homes closed	\$195,000	\$190,839	\$191,543	\$179,975	\$184,768	\$189,950	\$196,500
EXISTING HOMES							
Existing home sales closed	3,416	3,513	3,160	3,574	3,067	3,126	3,655
Median sale price of existing homes closed	\$125,500	\$127,000	\$125,000	\$125,000	\$125,000	\$125,000	\$131,000
Total single-family residential sales closed	4,127	4,140	3,626	4,041	3,467	3,507	4,164
Median sale price of single-family residential sales	\$135,000	\$134,900	\$133,000	\$129,900	\$130,000	\$130,000	\$137,800

**Year End Closed Sales
Single-Family Residential
Midlands MLS**

YEAR	EXISTING HOMES			NEW HOMES		
	AREA 11-47	AREA 50+	ALL AREAS	AREA 11-47	AREA 50+	ALL AREAS
2012	3003	652	3655	460	49	509
2011	2529	592	3121	335	46	381
2010	2468	612	3080	356	46	402
2009	2937	637	3574	408	59	467
2008	2612	548	3160	379	87	466
2007	2932	581	3513	538	89	627
2006	2866	550	3416	631	80	711
2005	3030	569	3599	890	84	974

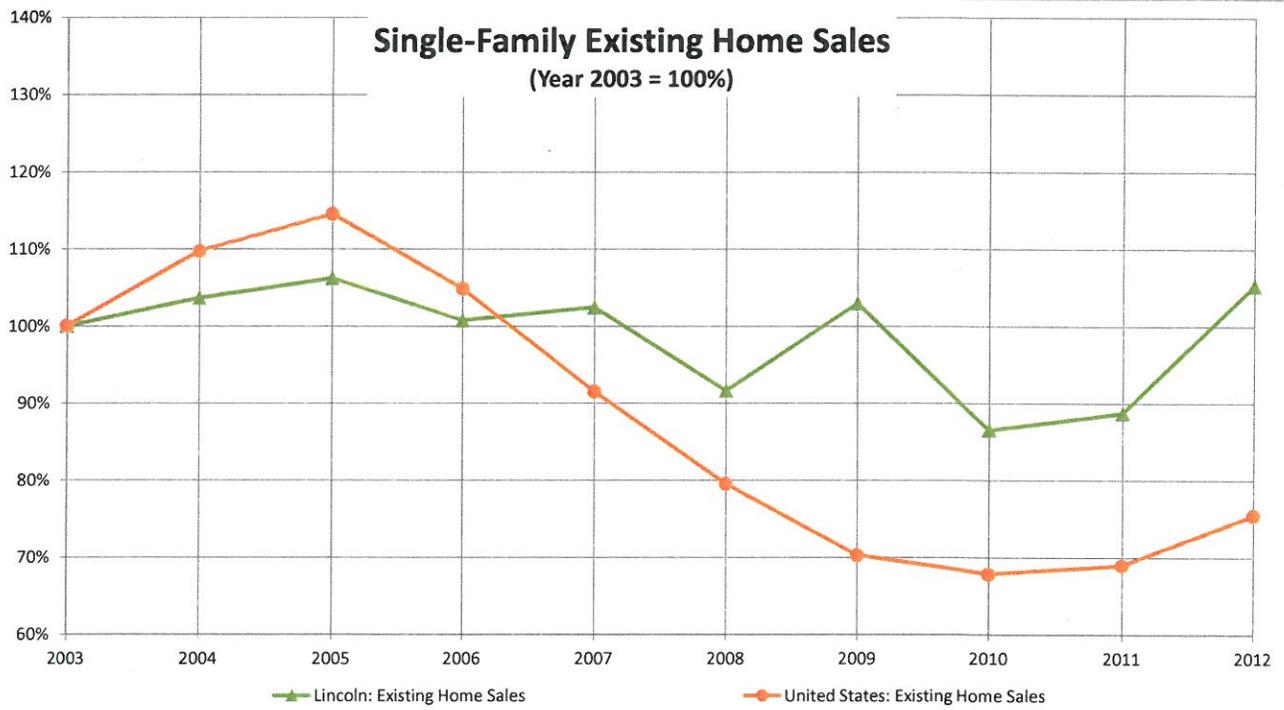
MLS Home Sales: Single-Family Residential

(Percent of year 2003; MLS Areas 11- 47; 50+)



Single-Family Existing Home Sales

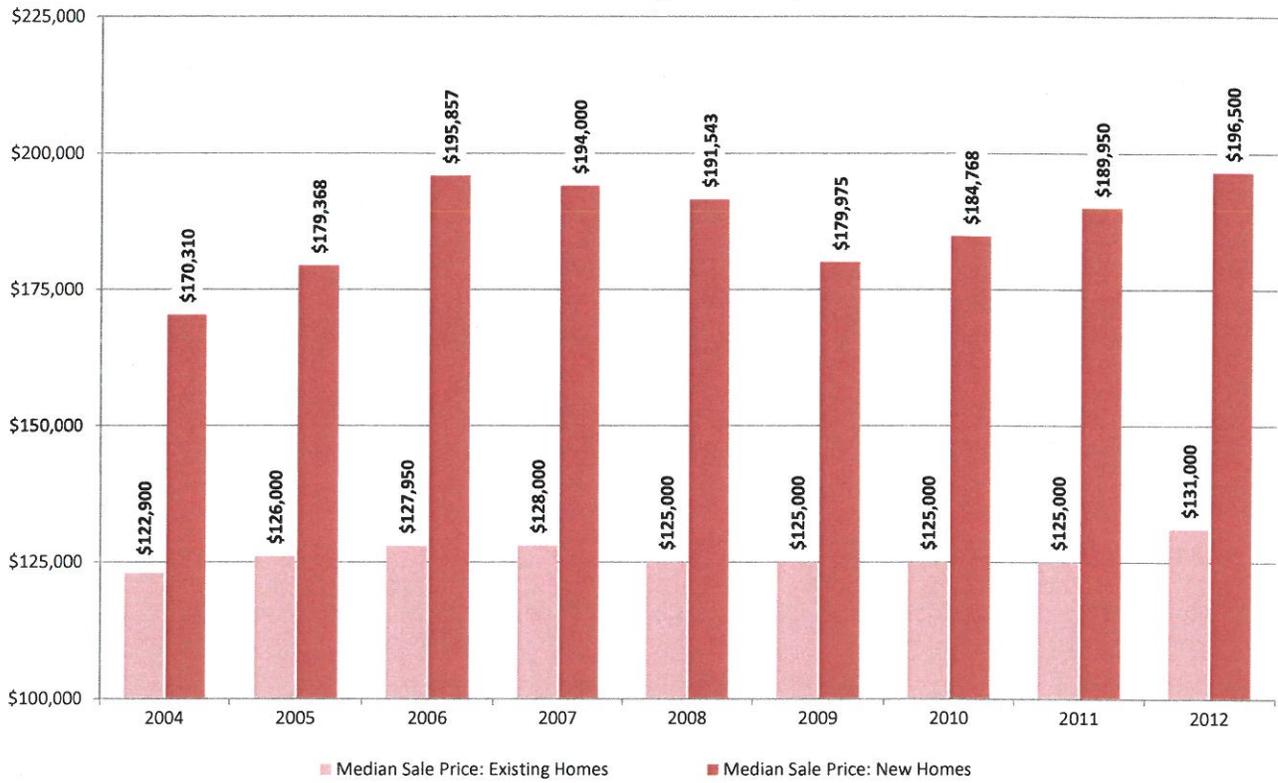
(Year 2003 = 100%)



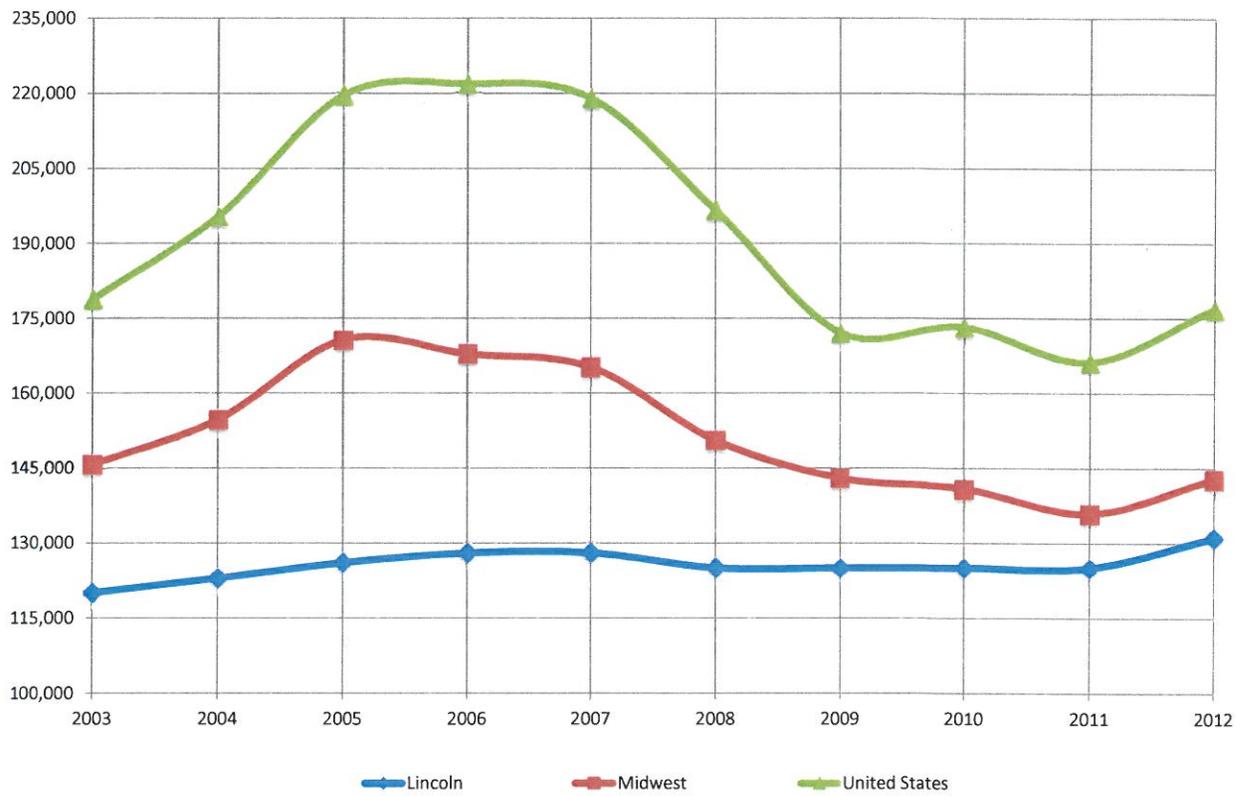
Lincoln, Nebraska: Residential Sales
(Midlands MLS / REALTORS® Association of Lincoln)

YEAR	Median Sale Price: Existing Homes	Median Sale Price: New Homes
2004	\$122,900	\$170,310
2005	\$126,000	\$179,368
2006	\$127,950	\$195,857
2007	\$128,000	\$194,000
2008	\$125,000	\$191,543
2009	\$125,000	\$179,975
2010	\$125,000	\$184,768
2011	\$125,000	\$189,950
2012	\$131,000	\$196,500

MLS Home Sales: Single-Family Residential



Median Sale Prices of Existing Single-Family Homes



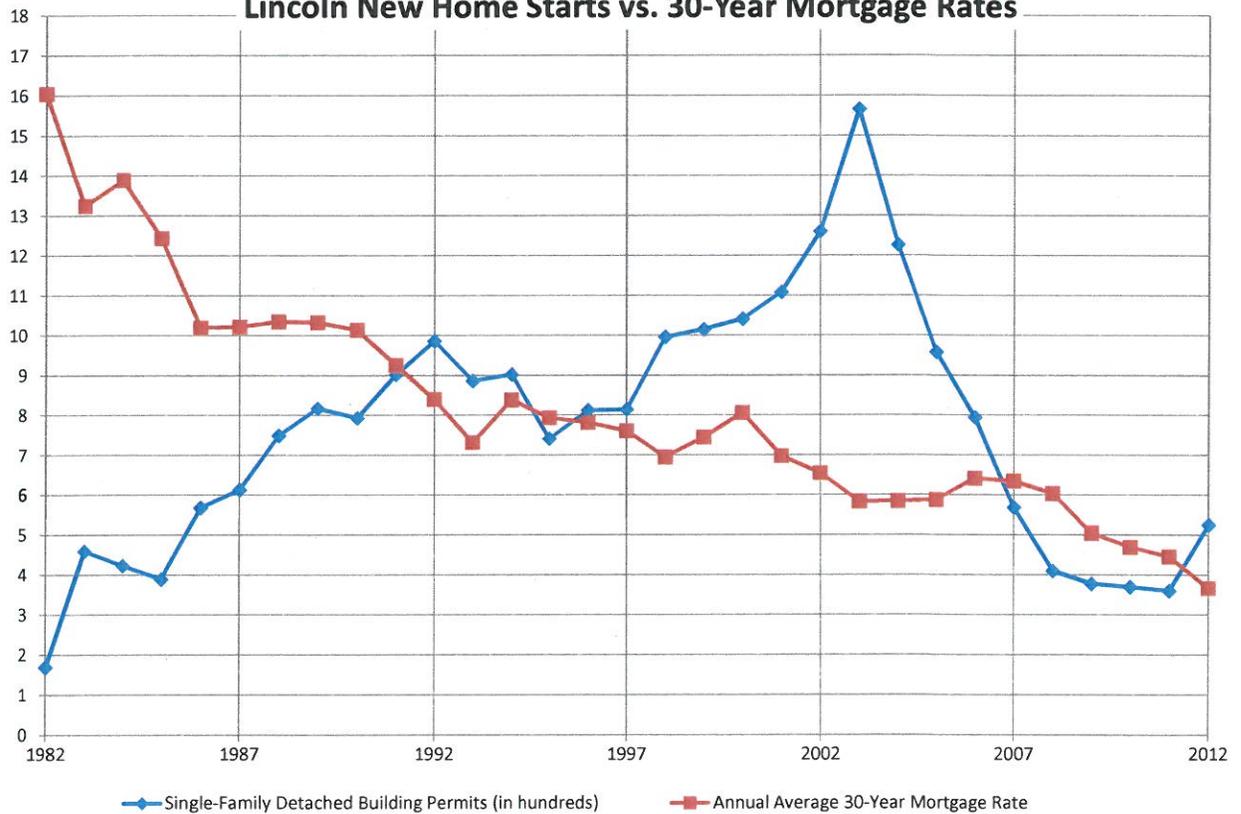
New and Existing Single-Family Home Sales 2012 - Midlands MLS

Area	Number Sold	Days On Market	Low	Median	High
11 NW Lincoln	125	62	\$65,000	\$126,500	\$259,869
12 NW Lincoln	140	51	\$48,000	\$129,000	\$274,500
13 NW Lincoln	58	76	\$22,000	\$132,500	\$835,000
14 NW Lincoln	183	64	\$36,101	\$126,500	\$289,000
15 NW Lincoln	60	84	\$18,000	\$92,250	\$525,000
16 NW Lincoln	59	64	\$104,500	\$189,950	\$487,000
50 NW Lancaster	10	131	\$90,000	\$230,000	\$410,000
51 Malcolm, NE	10	75	\$60,160	\$143,000	\$434,000
52 Raymond, NE	6	88	\$56,000	\$225,500	\$395,500
53 Davey, NE	2	64	\$71,500	\$177,000	\$282,500
150 NW out of Lancaster	179	80	\$6,000	\$118,000	\$425,000
21 NE Lincoln	25	40	\$10,000	\$147,000	\$337,045
22 NE Lincoln	94	64	\$17,000	\$79,000	\$195,000
23 NE Lincoln	226	54	\$14,400	\$91,230	\$180,000
24 NE Lincoln	289	51	\$35,000	\$140,500	\$475,000
60 NE Lancaster	11	79	\$157,000	\$196,500	\$430,000
61 Waverly, NE	49	77	\$90,000	\$168,000	\$412,000
160 NE out of Lancaster	103	81	\$24,000	\$110,000	\$579,189
31 SE Lincoln	193	52	\$1,155	\$107,500	\$350,000
32 SE Lincoln	256	62	\$26,850	\$126,750	\$825,000
33 SE Lincoln	325	55	\$30,000	\$197,000	\$865,000
34 SE Lincoln	221	49	\$58,120	\$151,500	\$423,000
35 SE Lincoln	387	65	\$51,000	\$199,900	\$1,200,000
36 SE Lincoln	121	54	\$150,000	\$241,935	\$785,000
37 SE Lincoln	24	29	\$65,000	\$151,900	\$615,000
70 SE Lancaster	19	54	\$42,000	\$265,000	\$850,000
71 Roca, NE	7	102	\$48,500	\$103,000	\$420,000
72 Hickman, NE	45	67	\$32,500	\$153,000	\$275,586
73 Firth, NE	12	74	\$41,500	\$180,000	\$325,000
74 Panama, NE	4	36	\$95,000	\$125,749	\$190,000
75 Bennet, NE	15	74	\$27,500	\$139,950	\$380,000
170 SE out of Lancaster	82	95	\$15,000	\$115,000	\$515,000
41 SW Lincoln	146	52	\$63,000	\$134,450	\$352,500
42 SW Lincoln	8	85	\$155,000	\$261,000	\$339,000
43 SW Lincoln	137	76	\$1,795	\$68,000	\$329,900
44 SW Lincoln	159	61	\$33,900	\$122,000	\$1,045,000
45 SW Lincoln	199	57	\$55,000	\$177,000	\$805,000
46 SW Lincoln	12	36	\$108,000	\$303,736	\$435,000
47 SW Lincoln	16	104	\$160,000	\$308,471	\$545,000
80 SW Lancaster	14	98	\$55,000	\$285,000	\$555,000
81 Denton, NE	4	106	\$107,000	\$151,000	\$279,900
82 Hallam, NE	2	188	\$160,000	\$184,000	\$208,000
83 Sprague, NE	2	81	\$77,000	\$82,750	\$88,500
180 SW out of Lancaster	125	89	\$6,800	\$85,000	\$390,000
All Market Areas	4,164	63	\$1,155	\$137,800	\$1,200,000

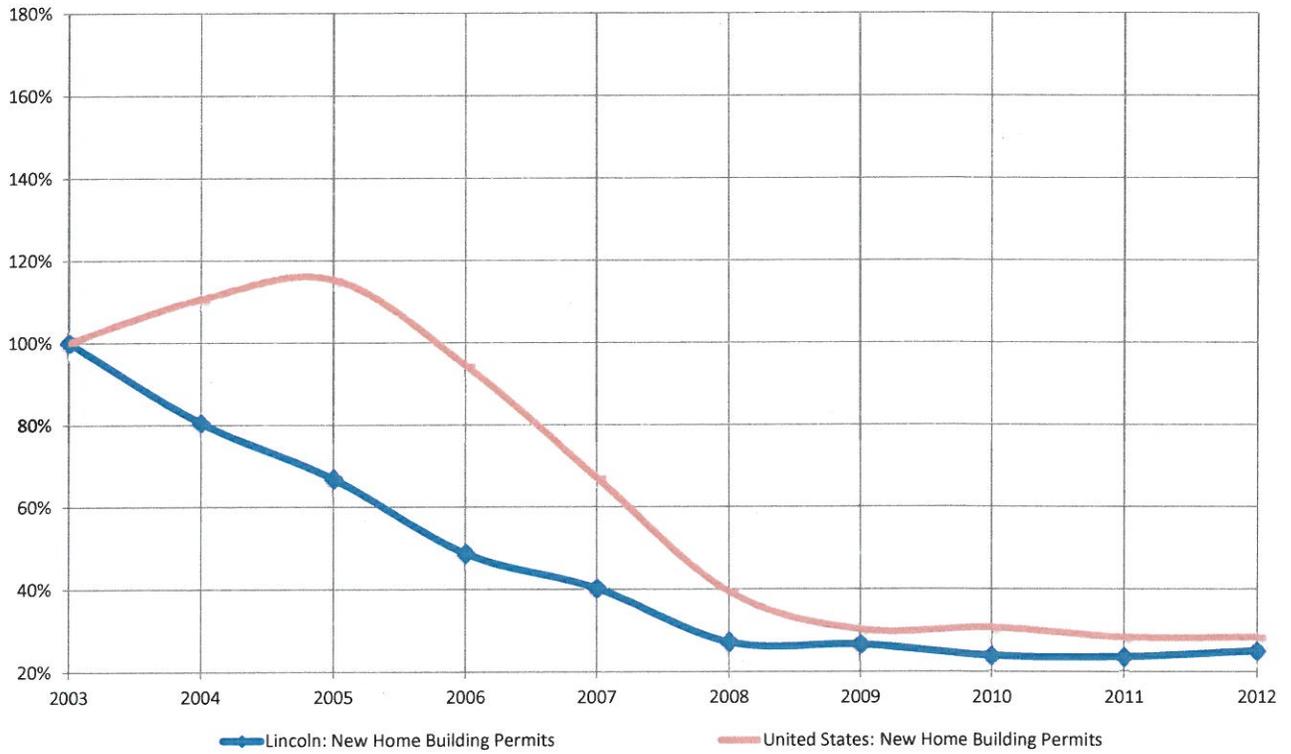
Lincoln New Home Starts vs. 30-Year Mortgage Rates

YEAR	Single-Family Detached Building Permits	Annual Average 30-Year Mortgage Rate
1975	1125	9.05
1976	1500	8.87
1977	1491	8.85
1978	1402	9.64
1979	947	11.20
1980	805	13.74
1981	394	16.63
1982	169	16.04
1983	459	13.24
1984	423	13.88
1985	389	12.43
1986	568	10.19
1987	613	10.21
1988	749	10.34
1989	817	10.32
1990	793	10.13
1991	902	9.25
1992	986	8.39
1993	886	7.31
1994	902	8.38
1995	741	7.93
1996	812	7.81
1997	814	7.60
1998	996	6.94
1999	1015	7.44
2000	1041	8.05
2001	1108	6.97
2002	1261	6.54
2003	1566	5.83
2004	1227	5.84
2005	958	5.87
2006	794	6.41
2007	569	6.34
2008	410	6.03
2009	378	5.04
2010	370	4.69
2011	360	4.45
2012	525	3.66

Lincoln New Home Starts vs. 30-Year Mortgage Rates



Single-Family New Home Permits (Year 2003 = 100%)



WRITTEN STANDARDS FOR ESG SERVICE

Each Emergency Solutions Grant (ESG)-funded service provider shall comply with the minimum written standards for providing ESG assistance established by the City of Lincoln in collaboration with the Lincoln Continuum of Care (CoC). Each provider may decide to set standards on their provision of ESG that exceed these minimum standards, but will at the very least comply with the following:

GENERAL STANDARDS

PARTICIPANT ELIGIBILITY:

Minimum standards for evaluating individual and family eligibility for assistance under Emergency Solutions Grant (ESG) are:

- **Street Outreach** – People who qualify as ‘unsheltered homeless,’ based on paragraph (1)(i) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): *engagement, case management, emergency health and mental health services, transportation*
- **Emergency Shelter** – People who qualify as ‘homeless,’ based on paragraphs (1, 2, 3 or 4) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.102): *case management; child care; education, employment and life skills services; legal services; health, mental health and substance abuse services; transportation*

NOT ALLOWABLE: Mortgage and mortgage arrearage payments.

- **Rapid Re-housing** – People who qualify as ‘homeless,’ based on paragraphs (1 or 4) of the “homeless” definition found at 24 CFR 576.2 and who moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.104, 576.105, 576.106):

- **Housing Relocation and Stabilization Services:** *moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management*
- **Rental Assistance:** *short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing*

The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

NOT ALLOWABLE: Mortgage and mortgage arrearage payments.

- **Homelessness Prevention** – People who qualify as ‘at risk of homelessness,’ based on paragraphs (2, 3 or 4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106):
 - **Housing Relocation and Stabilization Services:** *moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management*
 - **Rental Assistance:** *short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing*
 The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.
NOT ALLOWABLE: Mortgage and mortgage arrearage payments.
-

COORDINATED ASSESSMENT:

Minimum standards for centralized or coordinated assessment system are:

- Once the Continuum of Care has developed and adopted a centralized or coordinated assessment system in accordance with HUD’s requirements (24 CFR Part 578) all providers within the Continuum of Care’s area, except for victim service providers, shall use that assessment system.
 - A victim service provider may choose not to use the Continuum of Care’s assessment system.
-

PROGRAM COORDINATION:

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG-funded activities to the maximum extent practicable with the following:

- a. Emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing assistance providers;
- b. Other homeless assistance providers, including:
 - Shelter Plus Care Program;
 - Supportive Housing Program;

- Section 8 Moderate Rehab Program for Single Room Occupancy Program (SRO) for Homeless Individuals;
 - HUD-Veterans Affairs Supportive Housing (HUD-VASH);
 - Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
 - Grants for the Benefit of Homeless Individuals;
 - Healthcare for the Homeless;
 - Programs for Runaway and Homeless Youth;
 - Projects for the Assistance in the Transition from Homelessness;
 - Services in Supportive Housing Grants;
 - Emergency Food and Shelter Program;
 - Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program;
 - Homeless Veterans Reintegration Program;
 - Domiciliary Care for Homeless Veterans Program;
 - VA Homeless Providers Grant and Per Diem Program;
 - Health Care for Homeless Veterans Program;
 - Homeless Veterans Dental Program;
 - Supportive Services for Veterans Families Program; and
 - Veterans Justice Outreach Initiative
- c. Mainstream service and housing providers:
- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937;
 - Housing programs receiving Section 8 tenant based or project based assistance;
 - Supportive Housing for Persons with Disabilities;
 - HOME Investment Partnerships Program;
 - Temporary Assistance for Needy Families;
 - Health Center Program;
 - State Children’s Health Insurance Program;
 - Head Start;
 - Mental Health and Substance Abuse Block Grants;
 - Services funded under the Workforce Investment Act; and
 - State Housing Related Assistance Program for Adults with Serious Mental Illness
- d. Continuum of Care (CoC) Networks:
- Lincoln’s Continuum of Care (CoC) meetings – 4th Friday of every Month, 9:00-11:00 at Cedars Northbridge, 27th & Holdredge;
 - Governor’s Commission on Housing and Homelessness (includes provider representatives); and
 - Various other committees, task forces and workgroups.

HMIS:

Minimum standards for ESG data are:

- Providers, except for victim service providers shall actively utilize the Homeless Management Information System (HMIS), to enter data on people served and assistance provided under ESG.
 - Victim service providers shall actively utilize a comparable data system that meets HUD's standards (24 CFR 576.107).
-

INCOME DETERMINATION:

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

(a) *Annual income* means all amounts, monetary or not, which:

- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
 - (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
 - (3) Which are not specifically excluded in paragraph (c) of this section.
 - (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.
-

CONNECTION WITH OTHER RESOURCES:

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- Appropriate support services including:
 - Permanent housing;
 - Medical health treatment;
 - Mental health treatment;
 - Counseling;
 - Supervision; and
 - Other services needed for independent living.
- Other governmental and private assistance available to help with housing stability including:
 - Medicaid;
 - Supplemental Nutrition Assistance Program;
 - Women, Infants and Children (WIC);
 - Federal-State Unemployment Insurance Program;
 - Social Security Disability Insurance (SSDI);
 - Child and Adult Care Food Program; and
 - Other available assistance.

TERMINATION OF ASSISTANCE:

Minimum standards for termination of assistance are:

- **In general** – If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases.
 - **Program participants receiving rental assistance or housing relocation or stabilization services** – When terminating rental assistance or housing relocation and stabilization services, the required formal process shall minimally consist of:
 - Written notice clearly stating the reasons for termination;
 - Review of the decision that gives the participant opportunity to present objections to the decision maker; and
 - Prompt written final notice.
 - **Ability to provide further assistance** – Termination will not bar the provider from providing later additional assistance to the same family or individual.
-

LEAD-BASED PAINT:

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R.

SAFETY, SANITATION & PRIVACY:

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the safety, sanitation & privacy requirements identified in 24 CFR 576.403, including:

Minimum standards for emergency shelters:

Any building for which ESG funds were used for conversion, major rehabilitation or other renovation or that receives ESG assistance for shelter operations shall meet state/local government safety and sanitation standards, as well as the following:

- **Structure and materials**–The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- **Products and appliances**–Any ESG funded renovation, including major rehabilitation and conversion, must use Energy Star and WaterSense products/appliances.
- **Access**–The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implementing regulations.
- **Space and security**–Unless it is a day shelter, it must provide appropriate places to sleep, adequate space, and security for residents and their belongings.

- Interior air quality–Each shelter room/space must have proper ventilation and be pollutant free.
- Water supply–Must be free of contamination.
- Sanitary facilities–Each participant must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment–The shelter must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity–The shelter must have adequate and appropriate lighting and safe electrical sources.
- Food preparation–Any food preparation areas must be able to store, prepare, and serve safe and sanitary food.
- Sanitary conditions–The shelter must be in sanitary condition.
- Fire safety–Each occupied unit of the shelter must have at least one working smoke detector and when possible they should be near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas must have at least one working detector and there must be a second means of exiting the building in the event of an emergency.

Minimum standards for permanent housing – Providers shall not use ESG funding to help someone remain or move into housing if the housing does not meet the following minimum habitability standards.

- Structure and materials–The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security–Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality–Each room or space must have proper ventilation and be pollutant free.
- Water supply–Must be free of contamination.
- Sanitary facilities–Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment–The housing must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity–The structure must have adequate and appropriate lighting and safe electrical sources.
- Food preparation–All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- Sanitary conditions–The housing must be in sanitary condition.
- Fire safety:
 - There must be a second means of exiting the building in the event of an emergency.

- Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.
 - If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
 - The public areas of the housing must be equipped with a sufficient number of detectors, but not less than one for each area.
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CONFLICTS OF INTEREST:

Minimum standards for conflicts of interest are:

Organizational conflicts of interest:

- ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
- No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

Individual conflicts of interest:

- When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).

All transactions/activities:

- **Conflicts prohibited** – No person involved with the ESG program or who is in a position to participate in a decision-making process or gain inside information regarding the program's activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
 - **Persons covered** – These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.
 - **Exceptions** – A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404.
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HOMELESS PARTICIPATION:

Minimum standards for homeless participation are:

- To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG-funded facilities, in providing services under ESG and in providing services for occupants of ESG-funded facilities (24 CFR 576.405).

FAITH-BASED ACTIVITIES:

Minimum standards for faith-based activities (24 CFR 576.406) are:

- Providers receiving ESG funding shall not engage in inherently religious activities as part of the ESG-funded programs or services. Such activities must be offered separately from ESG-funded programs and services and participation must be voluntary.
 - A religious organization receiving ESG funding retains independence from government and may continue with its mission provided that ESG funds are not used to support inherently religious activities. An ESG-funded organization retains its authority over its internal governance.
 - An organization receiving ESG funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
 - ESG funding shall not be used for the rehabilitation of structures used specifically for religious activities, but may be used for rehabilitating structures that are used for ESG-eligible activities.
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NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE OUTREACH:

Minimum standards shall comply with the requirements for nondiscrimination, equal opportunity and affirmative outreach identified in §576.407 (a-b).

PROGRAM INCOME:

Minimum standards for private non-profit organizations for program income earned during the project period are that the program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained.

RECOVERED MATERIALS:

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in §576.407(f), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

DISPLACEMENT: Minimum standards for minimizing the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of a project assisted under ESG shall comply with §576.408 and consist of:

Minimizing displacement – Consistent with ESG goals and objectives, the providers shall minimize displacing people as a result of ESG-funded projects.

Temporary relocation not permitted - No temporary relocation shall be required for an ESG-funded project. When a tenant has to move for an ESG-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.

Relocation assistance for displaced persons -

In general – A displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights.

Displaced Person - A “displaced person” is defined as any person that moves from a permanent home as a result of ESG-funded acquisition, rehabilitation, or demolition of a project.

A person does not qualify as a “displaced person” if the person:

- Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced person.”
- The person is ineligible under 49 CFR 24.2.
- HUD determines that the person was not displaced as a result of the project.

The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.

Real property acquisition requirements – The acquisition of real property for an ESG funded project is subject to the URA and Federal government wide regulations.

Appeals - A person who disagrees with the recipient’s determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance may file a written appeal. A low-income person who disagrees with the recipient’s determination may submit a written request for review of that determination by HUD.

RECORDS & RECORDKEEPING:

Minimum standards shall ensure sufficient written records are established and maintained to enable the State and HUD to determine whether ESG requirements are being met and comply with §576.500, including the following:

- Program participant records shall include written:
 - Determination and verification/certification that the program participant met the criteria for being Homeless or At Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable
 - Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance
 - Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance
 - Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verification, when possible and applicable
 - Identification of the specific services and financial assistance amounts that were provided to the program participant
 - When applicable, verification that the services were terminated in compliance with 576.402
 - When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the program participant
 - Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
 - Determination and verification that the housing unit met HUD's habitability and lead-based paint standards
 - Copy of individualized housing stability plan
 - Notes verifying case management services were provided at least monthly, unless exempt from this requirement
 - Notes verifying program participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services
 - Notes verifying program participant was assisted to obtain necessary mainstream and other resources

- Program policies and procedures shall indicate:
 - Services are coordinated with Continuum(s) of Care, other homeless assistance/prevention programs and mainstream service and assistance programs
 - Compliance with HUD's ESG (24 CFR 576) requirements for:
 - Shelter and housing standards

- Conflict of interest
 - Homeless participation
 - Faith-based activity
 - Nondiscrimination, equal opportunity and affirmative outreach
 - Uniform administrative rules (24 CFR part 84)
 - Environmental review
 - Lobbying and disclosure (24 CFR part 87)
 - Displacement, relocation and acquisition
 - Procurement (24 CFR 84.40-84.48)
 - Program participant records are kept secure and confidential
 - Participation in HMIS or comparable database
 - Financial records shall include:
 - Supporting documentation for all costs charged to ESG grant
 - Documentation showing ESG funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
 - Documentation of the receipt and use of program income
 - Copies of procurement contracts
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STREET OUTREACH STANDARDS

MINIMUM STANDARDS:

Targeting/Engagement:

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport or camping ground.

Assessment/Service Provision/Referral/Prioritization:

- Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, transportation services.
- When appropriate based on the individual's needs and wishes, the provision of or referral to rapid rehousing services that can quickly assist individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to emergency shelter or transitional housing services.

EMERGENCY SHELTER STANDARDS

MINIMUM STANDARDS:

- **Admission:**
Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of "homeless," as specified in 24 CFR 576.2 (1, 2, 3 & 4) and agencies' eligibility criteria.
- **Assessment:**
Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered Emergency Shelter services, as needed and appropriate.
- **Prioritization/Diversion/Referral:**
When appropriate based on the individual's needs and wishes, the provision of or referral to Homeless Prevention or Rapid Rehousing services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter or Transitional Housing services.
- **Reassessment:**
Program participants will be reassessed as case management progresses, based on the individual service provider's policies.
- **Discharge/Length of Stay:**
Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.
- **Safety and Shelter Safeguards for Special Populations:**
Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING STANDARDS

ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive homelessness prevention assistance and which eligible families and individuals shall receive rapid rehousing assistance are:

- **Rapid Re-housing (RR)** – To be eligible for RR Housing Relocation and Stabilization Services and Short-term and Medium-term Rental Assistance, people must:
 - Meet the federal criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2 OR
 - Meet the criteria under paragraph (4) of the “homeless” definition in 24 CFR 576.2 and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.
- **Homelessness Prevention (HP)** – To be eligible for HP Housing Relocation and Stabilization Services and Short-term and Medium-term Rental Assistance, people must require HP services to prevent moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2, have an annual income below 30% of the median income for the area and:
 - Meet the federal criteria under the “at risk of homelessness” definition in 24 CFR 576.2 OR
 - Meet the criteria in paragraph (2), (3) or (4) of the “homeless” definition in 24 CFR 576.2.

PARTICIPANT CONTRIBUTION:

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid rehousing assistance are:

- Participant’s income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant’s file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider’s policies and clearly communicated to program participants.

RENTAL ASSISTANCE DURATION AND ADJUSTMENT:

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- Participants receive approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

SERVICE TYPE, AMOUNT & DURATION:

Minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant shall receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance are:

- **Financial Assistance:**
 - **Use with other subsidies** – Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.
 - **Rental application fees** – Payment shall only be made for fees charged by the owner to all applicants.
 - **Security deposits** – Payment shall not exceed (TBD).
 - **Last month's rent** – Payment shall not exceed one (TBD) month's rent and shall be included in calculating the participant's total rental assistance.
 - **Utility deposits** – Payment shall only be made for gas, electric, water and sewage deposits.
 - **Utility payments:**
 - Payment shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service.
 - A partial payment counts as 1 month.
 - Payment shall only be made if the utility account is in the name of the participant or a member of the same household.
 - Payment shall only be made for gas, electric, water and sewage costs.
 - Participants shall not receive more than 24 months of utility assistance within any 3-year period.
 - **Moving costs** – Payment shall only be made for temporary storage fees accrued after the date the participant begins receiving housing relocation and stabilization services and prior to the date the participant moves into permanent housing. Payment shall not be made for storage fees in arrears.

- **Housing Relocation and Stabilization Services:**

- **Housing search and placement services** – Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
 - Assessment of housing barriers, needs and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases
 - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
 - Assistance with obtaining utilities and making moving arrangements
 - Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

- **Housing stability case management** – Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:
 - Using the centralized or coordinated assessment system
 - Conducting the initial evaluation, including verifying and documenting participant eligibility
 - Counseling
 - Developing, securing and coordinating services and obtaining Federal, State and local benefits
 - Monitoring and evaluating participant progress
 - Providing information and referral to other providers
 - Developing an individualized housing and service plan
 - Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

- **Mediation** – Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.

- **Legal services** – Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period.
 - **Credit repair** – Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.
- **Rental Assistance:**
- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based housing.
 - Payment for short-term rental assistance shall not exceed 3 months.
 - Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.
 - Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees.
 - Except for a one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.
 - Payment shall not exceed the Fair Market Rent established by HUD (24 CFR 888) and shall comply with HUD's standard of rent reasonableness (24 CFR 982.507).
 - Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
 - Payment for shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant's lease.
 - Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement by ESG.

- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears.
- **Tenant-Based Rental Assistance**
The rental assistance agreement with the unit owner shall be terminated without further payment if:
 - The participant moves out of the unit
 - The lease terminates and is not renewed
 - The participant becomes ineligible to receive ESG rental assistance
- **Project-Based Rental Assistance**
Payment shall only be made under the following conditions:
 - The lease has an initial term of one year
 - The rental assistance agreement covers one or more permanent housing units in the same building
 - Each unit covered by the agreement is only occupied by participants
 - Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

RE-EVALUATIONS:

Minimum standards for completing eligibility re-evaluations of individuals and families are:

Timing:

- Homelessness Prevention – participants shall be re-evaluated not less than once every three months
- Rapid Rehousing – participants shall be re-evaluated not less than once annually

Eligibility:

- The participant shall have an annual income that is 30 percent of median family income for the area or less, as determined by HUD; and
- The participant shall lack sufficient resources and support networks necessary to retain housing without ESG assistance.

SP-45 Goals Summary

The table above includes the goals developed to address the four priority need areas identified for Lincoln: affordable housing, neighborhood revitalization, homelessness, and non-homeless special needs. Progress toward meeting the goals will occur in each of the five years of this plan. The geographic area targeted and funding allocation is also included. The outcome indicator is based on the three program outcomes identified by HUD and are designed to capture the nature of the change or expected result of an activity. See the Executive Summary at the beginning of this Plan for a full explanation of each outcome.

AP-20 Annual Goals and Objectives

The table above includes the goals developed to address the four priority need areas identified for Lincoln: affordable housing, neighborhood revitalization, homelessness, and non-homeless special needs. The table includes progress toward meeting the goals in the first year of the Strategic Plan's five years. The geographic area targeted and funding allocation is also included. The outcome indicator is based on the three program outcomes identified by HUD and are designed to capture the nature of the change or expected result of an activity. See the Executive Summary at the beginning of the Strategic Plan for a full explanation of each outcome.