

Opportunity: Preservation and Reinvestment Initiative for Community Enhancement (Price)

US Department of Housing and Urban Development

Lead Applicant: Communities Unlimited

Project: COME HOME Preservation of Manufactured Housing in Rural Communities

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Exhibit A Executive Summary  
Communities Unlimited

## **Executive Summary**

Through human connection and ingenuity combined with cutting-edge technology and expertise, Communities Unlimited (CU) connects people to solutions that sustain healthy businesses, healthy communities, and healthy lives. CU is unwinding generations of inequity and disinvestment in our rural communities. We work side by side with individuals, communities, and organizations to make opportunities accessible to everyone, everywhere.

CU is a rural development Hub and CDFI serving seven states in the southern United States, a racially and culturally diverse region with many rural communities. CU serves Alabama, Arkansas, Louisiana, Mississippi, Oklahoma, Tennessee, and Texas. Our work impacts people most affected by persistent poverty and social inequity, serving 45% of the persistent poverty counties in the country with a strategic focus on areas of high minority populations, including the Mississippi Delta, Alabama Black Belt, Tribal Country, and the Rio Grande Valley.

COME HOME is CU's community-centered rural housing approach assisting persistent poverty communities and low-income families to improve housing access and habitability. Through the PRICE Initiative, CU will expand the focus and impact of COME HOME to manufactured housing (MH) households, manufactured housing communities, and rural communities to preserve manufactured housing as an affordable housing solution in the rural south.

CU has three primary focus areas for the preservation of Manufactured Housing through our COME HOME Model: 1. Mississippi Delta Region of Arkansas and Mississippi, 2. Choctaw County Oklahoma, 3. East Texas. Following selection criteria described in Exhibit D of this application, CU may cascade services to rural communities within our seven-state service area that are located in areas outside of the three focus areas. CU will preserve MH as an affordable housing solution in rural communities in the states below, prioritizing efforts in persistent poverty counties.

COME HOME will create housing taskforce in communities across our service area and provide housing needs assessments, including environmental and man-made hazards testing, community strategic planning and individualized preservation plans, housing and homeownership education activities, and support housing and infrastructure repairs and preservation through revolving, low interest loans to MH owners, MHC owners, and rural communities. Additionally, CU will utilize PRICE assistance to preserve an affordable manufactured housing community in Hugo, Oklahoma. The total budget for CU's COME HOME PRICE application for the preservation of manufactured housing in rural communities is \$10,750,801. COME HOME will provide services in 65 rural communities, infrastructure loans up to \$150,000 to 20 rural communities for infrastructure repairs or improvements impacting low to moderate income manufactured housing residents or communities, and impact 150 LMI households with housing repair loans.

Affordability and equity are pillars of the COME HOME model. CU will utilize deed restrictions to ensure PRICE assisted manufactured housing units remain affordable for households at 80% AMI for 15-30 years. Through resident protection requirements, fair housing practices, and the use of affirmative marketing, CU will ensure that PRICE activities benefit LMI manufactured housing households in rural and persistent poverty communities, most likely to be affected by environmental and housing justice issues.

Exhibit B Threshold Requirements  
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Exhibit C Need  
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## **Factor A: Need**

### **Project Area**

Communities Unlimited (CU) is a rural development Hub and CDFI serving seven states in the southern United States, a racially and culturally diverse region with many rural communities. CU has three areas within the service areas that will be the primary focus of work for the preservation of Manufactured Housing (MH): 1. Mississippi Delta Region of Arkansas and Mississippi, 2. Choctaw County Oklahoma, 3. East Texas. Following selection criteria described in Exhibit D of this application, CU may cascade services to rural communities within our seven-state service area that are located in areas outside of the three focus areas. CU will preserve MH as an affordable housing solution in rural communities in the states below, prioritizing efforts in persistent poverty counties.

Alabama: Fifty-five of Alabama's sixty-seven counties are rural or mostly rural, and 18 are persistent poverty counties. Forty-four percent of the state population lives in rural communities. Alabama has approximately 236,700 occupied manufactured homes within the state, making up 11.7% of the state's occupied housing stock. There are approximately 186,900 extremely low-income (ELI) renters in Alabama. 84% of ELI renters in the state are cost burdened and 70% are extremely cost burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 94,229 affordable and available rental homes for ELI renters in Alabama. Over 17,000 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

Alabama Black Belt: Within the state of Alabama, CU will prioritize MH preservation efforts in the Black Belt Region. The region consists of seventeen counties, fourteen of which are categorized as persistent poverty counties. The Alabama Black Belt includes eleven majority-minority counties. These eleven counties have an average poverty rate of over 25%. Twenty percent of residents in this region live in manufactured homes.

Arkansas: Fifty-four of Arkansas's seventy-five counties are rural or mostly rural, and 15 are persistent poverty counties. Forty-four percent of the state population lives in rural communities. Arkansas has approximately 129,100 occupied manufactured homes within the state, making up 10.6% of the state's occupied housing stock. There are approximately 115,300 extremely low-income (ELI) renters in Arkansas. 85.5% of ELI renters in the state are cost-burdened, and 69% are extremely cost-burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 57,757 affordable and available rental homes for ELI renters in Arkansas. Over 5,500 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

Arkansas Delta (Focus Area): Within the state of Arkansas, CU will prioritize MH preservation efforts in the Arkansas Delta Region. The region consists of fifteen counties, 9 of which are categorized as persistent poverty counties, and parts of ten other counties, two of which are categorized as persistent poverty counties. All majority-minority counties in Arkansas are located in or partially located in the Delta Region. These eight counties have an average poverty rate of over 25%. Almost 80% percent of manufactured homes in the Arkansas Delta were built before 1999.

Louisiana: Forty of Louisiana's sixty-four parishes are rural or mostly rural, and 27 are persistent poverty counties. 28.5% of the state population lives in a rural area. Louisiana has approximately

221,000 occupied manufactured homes within the state, making up 12.2% of the state's occupied housing stock. There are approximately 183,300 extremely low-income (ELI) renters in Louisiana. 86% of ELI renters in the state are cost-burdened, and 71% are extremely cost-burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 107,966 affordable and available rental homes for ELI renters in Louisiana. Over 13,000 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

Mississippi: Sixty-five of Mississippi's eighty-two counties are classified as rural or mostly rural and forty-four are classified as persistent poverty counties. 54% of the state population lives in a rural area. Mississippi has approximately 165,000 occupied manufactured homes within the state, making up 14.4% of the state's occupied housing stock. There are approximately 108,900 extremely low-income (ELI) renters in Mississippi. 83% of ELI renters in the state are cost-burdened, and 65% are extremely cost-burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 49,478 affordable and available rental homes for ELI renters in Mississippi. Over 11,800 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

Mississippi Delta (Focus Area): Within the state of Mississippi, CU will prioritize MH preservation efforts in the Arkansas Delta Region. The region consists of eighteen counties, fourteen of which are categorized as persistent poverty counties. The fourteen persistent poverty communities in the region are all majority-minority counties. These fourteen counties have an average poverty rate of over 33%. Over 17% of the housing stock in the region is manufactured housing.

Oklahoma: Sixty of Oklahoma's seventy-seven counties are classified as rural or mostly rural and eleven are classified as persistent poverty counties. 32.6% of the state population lives in a rural area. Oklahoma has approximately 126,400 occupied manufactured homes within the state, making up 8% of the state's occupied housing stock. There are approximately 133,000 extremely low-income (ELI) renters in Oklahoma. 86% of ELI renters in the state are cost-burdened, and 71% are extremely cost-burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 77,344 affordable and available rental homes for ELI renters in Oklahoma. Over 12,800 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

Choctaw County (Focus Area) : Within the state of Oklahoma, CU will begin MH preservation efforts in Choctaw County. Choctaw County has a poverty rate of over 24%. MH makes up over twelve percent of occupied housing stock in Choctaw County. CU owns and manages an affordable MHC in the city of Hugo, the county seat of Choctaw County. Hugo has a poverty rate of 27.7%

Tennessee: Seventy of Tennessee's ninety-five counties are classified as rural or mostly rural and eight are classified as persistent poverty counties. 21% of the state population lives in a rural area. Tennessee has approximately 214,700 occupied manufactured homes within the state, making up 7.9% of the state's occupied housing stock. There are approximately 209,500 extremely low-income (ELI) renters in Tennessee. 84.5% of ELI renters in the state are cost-burdened, and 69.7% are extremely cost-burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 121,810 affordable and available

rental homes for ELI renters in Tennessee. Almost 16,000 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

Texas: 172 of Texas’s 254 counties are classified as rural or mostly rural and thirty are classified as persistent poverty counties. 16% of the state population lives in a rural area. Texas has approximately 668,000 occupied manufactured homes within the state, making up 6.4% of the state's occupied housing stock. There are approximately 907,000 extremely low-income (ELI) renters in Texas. 91% of ELI renters in the state are cost-burdened, and 79% are extremely cost-burdened. In their 2024 Gap Report, the National Low-Income Housing Coalition (NLIHC) projected a shortage of 679,301 affordable and available rental homes for ELI renters in Texas. Almost 53,500 publicly subsidized rental homes in the state have affordability restrictions that will retire within the next ten years.

East Texas (Focus Area): Within the state of Texas, CU will begin MH preservation efforts in the East Texas region to leverage the efforts of the CU Community Sustainability team currently working in the region. East Texas includes the following counties: Anderson, Angelina, Cherokee, Hardin, Harris, Houston, Jasper, Jefferson, Liberty, Nacogdoches, Newton, Orange, Panola, Polk, Rusk, Sabine, San Augustine, San Jacinto, Shelby, Trinity, and Tyler. The region has an average poverty rate of 17.7%. MH makes up over 32% of occupied housing stock in Sabine County. Located in Sabine County, the city of Pineland, Texas, has a poverty rate of over 41%. MH makes up over 21% of occupied housing within the Pineland city limits.

**Distress Criteria**

CU is a certified CDFI, meeting the CDFI requirement for activity in low-to-moderate-income (LMI), distressed, and underserved areas. As a CDFI, CU specializes in lending to individuals and businesses in under-resourced communities. CU is a rural development hub, working holistically with rural leaders, creating positive change in communities. In 2023, CU provided services in 723 rural communities. Forty-five percent of all persistent poverty communities, areas with a poverty rate of 20% or more for 30 years, are located in the CU footprint and the priority areas identified for CU’s work to preserve MH and MHCs and assist rural communities in identifying and addressing their affordable housing needs.

**Disaster Resilience:**

Eighty-seven census tracts within the CU service area are designated Community Disaster Resilience Zones (CDRZ). These communities have a very low ability to prepare for, withstand, and recover from natural and man-made disasters compared to the rest of the U.S. CU has prioritized persistent poverty and rural communities for the preservation of MH as an affordable housing solution. Of the eighty-seven CDRZs in the CU service area, eleven are in persistent poverty counties, and 24 are in rural counties.

State	Total CDRZ	CRDZ in Rural County	CRDZ in Persistent Poverty County
AL	6	1	2
AR	8	7	6
LA	6	0	0
MS	9	3	2
OK	11	7	0



TN	12	2	0
TX	35	4	1

Tornados, strong winds, flooding, and extreme temperatures are natural disasters commonly identified by CDRZs within the CU service area. In 2022, six hundred and eleven, or approximately 46% of all tornadoes recorded in the US, occurred within the seven-state CU service area, resulting in over \$308 million in property damage. The table below depicts the community resiliency and social vulnerability rates of four counties within the CU service area located in CU priority areas. St. Francis County, AR contains at least one CDRZ census tract.

County	Social Vulnerability	Community Resiliency
Choctaw County, OK	92.23 (Very High)	8.98 (Very Low)
Desha County, AR	92.71 (Very High)	41.3 (Relatively Moderate)
Sabine, County TX	52.39 (Relatively Moderate)	8.75 (Very Low)
St. Francis County, AR	98.35 (Very High)	7.32 (Very Low)

CU’s plans for promoting community resiliency and mitigating the effects of natural and man-made disasters are described in Exhibit D of our application.

**Barriers to Preservation and Revitalization:**

CU serves 45% of all persistent poverty counties in the United States. Throughout the CU service area, poverty is persistent and pervasive. Studies show that safe, affordable, and accessible housing is key to reducing generational poverty, but rural communities face unique challenges and barriers in addressing both the housing and resource crisis. Rural communities are impacted by higher costs of construction in comparison to urban areas, resulting in a disincentive for investors, lack of credit access for builders, developers, homebuyers, and property managers, declining federal investment for affordable housing in rural areas, and decreased affordability resulting from expiring subsidies and aging housing stock.

Persistent poverty is a primarily rural issue. A study conducted by poverty experts from Princeton University and the University of Michigan found that the most disadvantaged places in the US are mostly rural and, in the deep south, follow historical geographical patterns of slave ownership and racial segregation. Twenty-two counties within the Delta Focus Area are majority-minority counties, with populations of Black residents over 50%. Systemic inequalities and deep-set perceptions about poverty and race within the service area may create barriers to CU’s engagement of community leaders, stakeholders, and residents. In addition to these socio-political issues, barriers to successful preservation and revitalization efforts for MH and MHCs in the CU service area fall into three main categories.

1. Land Use and Zoning Requirements

The Manufactured Housing Institute has identified a growing trend of municipalities using land use requirements and targeted zoning restrictions to restrict or eliminate manufactured housing in their jurisdictions. Stimming from historical perceptions of manufactured housing, local political opposition may create barriers to replacing pre-1976 MHs or updating zoning requirements to allow MH within jurisdictional limits. For example, the state of Arkansas requires that municipalities allow MH in at least one zoning district. However, many towns and cities have relegated MH and MHCs to the

least desirable and least accessible districts within their jurisdiction limiting MH residents' access to transportation, social services, grocery stores, and other vital resources. CU will work with local leaders and officials to understand their zoning requirements and the impact they have on affordable housing solutions such as manufactured housing.

2. Access to Building Trades and Resources

In a 2023 report from the Home Builders Institute (HBI), 80 to 85 percent of remodelers reported a shortage of building trade subcontractors, with 90% reporting a shortage of carpenters. An architect for USDA projected that the US will lose 80% of the construction industry workforce in the next decade, causing construction and housing repair projects to take longer and become more expensive. All seven states in the CU service area have reported a lack of skilled workers in the construction and building trades. With most contractors and subcontractors concentrated in metropolitan areas with thriving housing markets and large-scale development projects, rural communities face an acute shortage of skilled construction labor that may impact repair and revitalization efforts in rural communities through increased costs, extended completion times, and a lack of interest in small-scale projects. Additionally, construction-related transportation costs are often higher and the timeline for delivery longer in rural areas.

3. Insufficient Infrastructure

Rural communities often lack the tax base to pay for infrastructure repairs and improvements. Across the seven-state service area, the CU Environmental Services Team is actively working in over 400 rural communities to address water and wastewater issues stemming from aging infrastructure, labor shortages, and water contamination. Rural communities face aging and insufficient physical infrastructure, including unsafe water and sewer systems, crumbling roads and sidewalks, and a lack of broadband access. A lack of investment and support for rural MHCs and available resources for MH owners in remote, rural areas exacerbates these issues.

Exhibit D Approach  
Communities Unlimited

## **Factor B: SOUNDNESS OF APPROACH**

### **Project Description, Management, and Impact**

Vision and Goals: For decades, the United States has created and implemented strategies and policies to address housing access and affordability, utilizing data drawn from the largest cities and communities in the nation and replicated these strategies with little consideration or understanding of the disparate impact on rural communities. About 20% of the US population lives in rural areas, but persistent poverty rates in these areas are the highest in the nation. In addition to high poverty rates, a disproportionate amount of the nation's occupied substandard housing is located in rural areas. Manufactured housing accounts for fifteen percent of all occupied housing in rural areas in contrast to three percent of urban housing. In a study by Environmental and Energy Study Institute, older manufactured homes can consume up to fifty three percent more energy than other types of homes, largely due to heating and cooling poorly insulated homes.

COME HOME is an innovative community housing program developed and implemented by Communities Unlimited to support rural communities in identifying and addressing their unique housing needs. COME HOME provides technical assistance, resources, and financial support directly to rural and persistent poverty communities and low-income families most at risk for housing insecurity living in those communities. COME HOME engages rural community members, stakeholders, government officials, developers, lenders, and employers in developing and implementing innovative, local housing strategies that encourage place-based upward mobility, support the cooperative engagement of neighboring communities and address barriers to accessing and maintaining housing. By building local capacity to address local priorities, COME HOME helps communities replace the top-down, blanket implementation of housing programs with locally controlled, sustainable rural housing systems and leverages funds and resources to benefit underserved populations facing housing insecurity. COME HOME provides flexibility and support to rural communities in a way that is scalable and replicable.

Together, with our communities, CU creates a path that allows our rural neighbors to COME HOME to thriving and sustainable homes.

Come Home has four key components:

1. Housing Needs Assessment
2. Strategic Housing Planning
3. Resource and Service Portfolio Development
4. Housing and Infrastructure Repairs and Preservation

CU will expand our existing COME HOME services to engage rural communities and Manufactured Housing Communities in a minimum 2-year process to complete the four key components of the COME HOME model. During the first year of engagement, CU will lead rural communities and MHCs in rural counties through planning activities that include the formation of a housing taskforce, completion of a comprehensive housing needs assessment, and

a strategic planning process. CU will engage local MH and MHC residents and owners and community stakeholders to create a Housing Taskforce in communities enrolled in COME HOME that will help to set priorities for their communities during this process. Through the comprehensive housing needs assessment communities and MHCs will review policy and zoning restrictions and identify affordable housing barriers, infrastructure needs, and barriers to the preservation of manufactured housing as an affordable housing solution. Communities in or containing persistent poverty census tracts or defined as Historically Disadvantaged will be prioritized for enrollment in the COME HOME process. Following the housing needs assessment, CU will assist the community with developing a strategic housing plan that encourages the revitalization and enhancement of MHCs and MH units, recognizes manufactured housing as a viable and sustainable affordable housing solution, supports community resilience, and encourages homeownership among MH and MHC residents.

During the second year of enrollment, CU will assist communities with the development of their housing resource and service portfolio. Where gaps exist in the community's existing housing services and resources, CU may provide services such as homeownership education, loan packaging, technical assistance, lending, and housing development. CU will assist the communities in engaging stakeholders, developers, lenders, and investors for strategic initiatives and goals. CU may provide low interest loans to communities and MHC to address infrastructure and resiliency needs directly impacting MH residents with the goal to preserve MHCs and affordable MH units, support safe and accessible manufactured housing within rural communities and MHC. All manufactured housing units utilized as rental property or otherwise occupied by persons other than the owner or located in a MHC receiving PRICE assistance for infrastructure repairs or improvements will be subject to affordability requirements as described below. CU may also provide low interest loans or forgivable loans to eligible rural MH owners of owner occupied and renter occupied units to complete health and safety repairs with the overall goal to preserve affordable, manufactured housing in rural communities. CU housing staff will monitor the selection of contractors and vendors to complete housing repairs and ensure the acceptable completion of repairs before making direct payments to the vendors for satisfactory work. (National Objective: Benefit to LMI persons)

In addition to working with communities through the development and support of a housing taskforce, CU will work with individuals and households to improve their housing conditions, financial skills, and knowledge, change financial behaviors, and build financial assets through housing counseling and education. CU's Housing Counseling Technician will enroll low- to moderate-income households living in MH into our Housing Counseling and Education program based on best practices and the HUD housing counseling requirements. Through the COME HOME housing counseling and education curriculum, participants will gain skills in household budgeting, credit management, and repair and will receive guidance in securing and maintaining permanent housing through rent or homeownership. MH residents may receive assistance in securing lot ownership, clear title, purchase of manufactured or other affordable housing, and addressing their unique housing needs. Housing Counseling and Education services will be provided to LMI participants at no cost to the participant through in-person classes and

counseling and CU's online learning management system. (National Objective: Benefit to LMI persons)

Through CU's strategic blending process, COME HOME staff members will connect communities and individuals to teams within our organization and facilitate cross-team collaboration to address multiple challenges contributing to housing insecurity. Through this process, participating communities, MHCs, and MH residents will have access to services and technical assistance in the following focus areas:

1. **Community Sustainability:** partners with communities to create vibrant, sustainable economies, small-scale farmers to promote healthy eating, and rural communities to access broadband resources.
2. **Entrepreneurship:** works alongside small business owners to grow and sustain businesses, access resources, and build wealth. CU serves as the Arkansas MBDA Business Center.
3. **Environmental/Housing:** works with rural communities' water and wastewater facilities, individuals without access to clean drinking water, community development projects, and innovative housing initiatives at the intersection of housing and environmental justice.
4. **Lending:** As a U.S. Treasury-certified Community Development Financial Institution (CDFI), CU makes loans to small businesses to position them for profitable growth leading to new jobs and local economic development, provides financing to rural communities and tribal nations to improve and maintain their drinking water and wastewater systems, and small dollar loans to people in the Colonias for home improvement projects.

Through CU's innovative strategic blending approach, COME HOME leverages the resources and experience of our other teams to address the housing and development needs of rural communities. Through this model, communities and residents in MHC will have access to community development resources, economic and small business support, environmental justice tools, and capital.

COME HOME transforms the housing development model for rural communities, focusing efforts on identifying each community's unique needs, creating a community-centered plan for long-term and sustainable improvement, and injecting much-needed capital directly into rural communities early enough in the process to attract investors and developers and create a sustainable, locally controlled housing solution. Manufactured housing provides an unsubsidized solution to the rural housing crisis, mitigating some of the effects caused by the lack of builders, developers, and construction professionals in rural and persistent poverty communities. Through assessment, planning, and technical assistance provided to rural communities and MHC, low-interest lending products for community infrastructure and health and safety repairs for LMI households living in manufactured housing, and housing education resources, COME HOME will help to preserve affordable, manufactured housing rural communities across our seven-state footprint.

The goals of manufactured housing preservation through CU's COME HOME model include:

1. Preservation of existing manufactured housing in rural areas and persistent poverty communities.
2. Improved infrastructure, including water/ wastewater systems, sewer systems, and broadband, in rural MHC and/or impacting MH residents in rural areas.
3. Long term viability and affordability of MHC and MH units in rural areas
4. Ongoing availability of safe and healthy manufactured housing units in rural areas
5. Improved financial literacy, expanded homeownership opportunities, increased access to affordable housing, and increase wealth building opportunities for manufactured housing residents, specifically in rural areas and in communities of color.

CU will initiate COME HOME services through the PRICE program in three focus areas:

1. Mississippi Delta of Arkansas and Mississippi
2. East Texas
3. Choctaw County, Oklahoma

CU may replicate these services in other areas of our seven-state service area. For expansion and replication of the COME HOME Model for Manufactured Housing Preservation, CU will use the following guidelines and criteria to select additional rural communities or areas for enrollment. COME HOME will provide MH preservation services in communities classified as rural. CU will utilize our Affirmative Fair Housing Marketing Plan to provide outreach and marketing in persistent poverty counties as identified by the American Community Survey of the Bureau of the Census, census tracts with a poverty rate of at least 20 percent as measured by the most recent 5-year data series available from the American Community Survey of the Bureau of the Census, Historically Disadvantaged communities defined by the Justice40 Interim Guidance Addendum, majority-minority counties, and other disadvantaged rural areas. All manufactured housing units utilized as rental property or otherwise occupied by persons other than the owner or located in a MHC receiving PRICE assistance for infrastructure repairs or improvements will be subject to affordability requirements as described below. The housing repair loan component of COME HOME is open to low-to-moderate income households living in manufactured housing in rural areas with the option to forgive part or all of the loan for households living in an owner-occupied unit with income at or below 80% AMI. CU will collect income information from all loan applicants. COME HOME will utilize CDBG LMI limits and the current fiscal year AMI as defined in the HUD Income Limits Survey by county. Income limits are based on family size. CU will utilize our Affirmative Fair Housing Marketing Plan to provide outreach and marketing to households living in manufactured housing or MHCs or the owners of renter occupied manufactured housing or MHCs in rural areas classified as persistent poverty counties as identified by the American Community Survey of the Bureau of the Census, census tracts with a poverty rate of at least 20 percent as measured by the most recent 5-year data series available from the American Community Survey of the Bureau of the Census, Historically Disadvantaged communities defined by the Justice40 Interim Guidance Addendum, majority-minority counties, and other disadvantaged rural areas. Rural areas in the Alabama Black Belt and the Louisiana Delta region are areas with high concentrations of rural, persistent poverty and disadvantaged

communities that CU has identified as focus areas for expansion and replication of COME HOME for Manufactured Housing Preservation.

#### Eligible Activities

Community Outreach and Engagement: CU will utilize best practices of Affirmative Marketing as outlined in our Affirmative Fair Housing Marketing plan to engage rural communities and MHCs around the topic of the preservation of manufactured housing as an affordable housing solution to identify and enroll eligible communities in the COME HOME Model. Services and benefits provided through COME HOME will be affirmatively marketed broadly throughout rural communities, persistent poverty counties, and majority-minority counties in the CU service area. Through extensive community outreach, CU will engage communities in disadvantaged areas in the rural south with historical patterns of racial segregation, socio-economic disparities, disinvestment and provide PRICE assisted services for the preservation of manufactured housing in these areas.

Manufactured Housing Resident and Owner Engagement: CU will utilize best practices of Affirmative Marketing as outlined in our Affirmative Fair Housing Marketing plan to engage manufactured housing residents and owners in PRICE assisted services that support the preservation of manufactured housing in rural areas and support homeownership and wealth building among LMI households. COME HOME housing repair loan products, housing education and counseling, and homeownership support services will be marketed across CU service areas with specific focus in communities in disadvantaged areas in the rural south with historical patterns of racial segregation, socio-economic disparities, disinvestment.

Community Housing Taskforces: CU will assist each community enrolled in COME HOME to establish a Housing Taskforce consisting of dedicated volunteers reflective of the racial and socioeconomic makeup of the area who live and/or work in the community. Each housing taskforce will include a minimum of one resident of any MHC being engaged in the COME HOME process and one manufactured housing resident living in an area other than an MHC. The housing taskforce may include representatives of local housing organizations, social services providers, shelters, continuums of care, other nonprofits, local government, and owners or managers of local MHCs. The CU PRICE Coordinator for each focus area will lead the housing taskforce through the housing needs assessment and strategic planning processes and provide technical assistance and training around manufactured housing preservation and affordability and other rural housing needs and solutions. The formation of a diverse and inclusive housing taskforce will help to ensure participation by underserved communities and groups least likely to participate in the community while also addressing the disparities in representation from black and brown individuals, economically disadvantaged households, and residents of MH and MHCs.

Housing Needs Assessment: A Housing Needs Assessment is a tool used by local communities to understand the strengths and weaknesses within the current housing market, identify the housing gaps and needs within the community, and to utilize this information to prioritize resources in the development and implementation of a housing strategy. Although a housing needs assessment is vital for communities to make informed decisions in developing housing policy and supporting housing development, many rural communities lack the financial resources



and personnel to complete a comprehensive housing needs assessment. CU will work with communities, MHC owners, and MH households to complete community and household housing needs assessments at no cost to the community, MHC owner, or MH household, mitigating the disparities in data and planning resources for rural communities and LMI households.

- Community: CU will work with each housing taskforce to collect data and analyze the housing needs of the enrolled community, providing communities with data to make decisions about housing policy and preservation while also creating a group of volunteers familiar with the processes of a housing needs assessment. A final report will be given to the housing taskforce for approval before being made available to local government officials and the public. A representative from CU and the housing taskforce will present the findings of the housing needs assessment during a community meeting. The housing needs assessment will include the following:
  - Demographic Assessment- Data collected through publicly available sources such as the US Census.
  - Housing Readiness Assessment- Review of resources, policy, codes, and programs that impact housing, development, and innovative housing solutions such as manufactured housing in the community.
  - Housing Infrastructure Assessment- CU housing staff will work with our environmental team to assess the current infrastructure in the community. Assessments may include internal tools such as a Technical, Managerial, and Financial Capacity (TMF) assessment, walkability survey, or community infrastructure survey, and external tools such as the Climate and Economic Justice Screening Tool or the EPA Public Infrastructure Coordination Assessment and Planning Tool. The infrastructure assessment will also consider current and future capacity to support manufactured housing and the preservation of MHCs in the community. CU will assess the resiliency and disaster preparedness and recovery needs of the infrastructure systems of the community, including the infrastructure accessible by MHC and MH households in the community. CU may also provide MHCs with an assessment of their current infrastructure and future needs, as well as resiliency and disaster preparedness and recovery needs of their current infrastructure systems.
  - Housing Market Assessment- The housing market assessment includes an analysis of current affordability rates and trends in the community, housing cost burden, existing housing stock conditions and needs, listings, sales, and cost of homes sold within the past three years, new builds in the previous three to five years, rental rates and availability, and subsidized housing waiting lists and program availability. CU may also provide MHCs with information on affordability rates over time and available subsidized housing resources.
  - Public Perception Survey- CU will work with the housing taskforce in each community to complete public perception surveys around housing needs in the community and the use of manufactured housing as an affordable housing solution. Public perception survey tools utilized by CU include community focus groups and a anonymous community wide survey available online or through hardcopies available at community accessible locations such as libraries and city offices.

- Physical Environment and Windshield Analysis- The Physical Environment and Windshield Survey will document changes in housing over time, housing quality, upkeep across neighborhoods, vacancies and blight, concentrated areas of poverty and prosperity. CU will work with the housing taskforce to complete a windshield survey within the community and GIS resources available through our GIS department. CU will assess the resiliency and disaster preparedness and recovery needs of the community, including the resiliency needs of MHC and MH households in the community. CU may also provide MHCs with an assessment of their current infrastructure and future needs, as well as resiliency and disaster preparedness and recovery needs.
- Housing Needs Projections- CU will utilize employee and employer surveys and an analysis of the gap between current and future needs to provide a projection of future development needs.
- MH Households: CU will identify LMI residents living in manufactured housing through affirmative marketing strategies. Cu may work with LMI MH households to determine health and safety repair or replacement needs as determined by an interview with the household and a housing walk through conducted by staff trained in identifying housing needs and health and safety preventative actions.
  - Testing- CU may provide the following testing for MH households either internally or through an outsourced vendor certified in the testing procedures:
    - Water System
    - Septic/Sewer
    - Other infrastructure
    - PFAS
    - Lead
    - Radon
    - Asbestos and Manmade Fibers
    - Mold Growth
    - Pests
    - Air Quality
    - Other Gases
    - Heat Resiliency
    - Weather Resiliency

Strategic Planning:

- Community: CU will work with the housing taskforce and community stakeholders to create a strategic plan using the data collected and presented in the Housing Needs Assessment. Although the strategic plan may include general suggestions for housing and affordable housing solutions, the primary focus will be on the use of MH as an affordable housing solution in the community and may include steps on revising local policy, zoning restrictions, or municipal code. When applicable, the plan will include suggestions for repairs or improvements of existing infrastructure for general improvement of life within the community or as a means to preserve or encourage the MH as an affordable housing solution. CU may provide MHCs in the community with plans for addressing infrastructure needs. The strategic plans will be presented as a community strategy report or MH Community Strategy Report for MHCs and owners of multiple rental MHs.

Reports will include proposed next steps and available resources for all suggestions with primary focus on the infrastructure needs for the preservation of manufactured housing in the community as well as housing preservation steps for MHCs. The community strategy report will be given to the housing taskforce for approval before being made available to local government officials and the public or MHC owners. A representative from CU and the housing taskforce will present the community strategy report during a community meeting. Communities may elect to continue their enrollment in the COME HOME program with access to our lending and wealth building and homeownership support activities below or to exit the program after receiving the community strategy plan. The community strategy plan will provide communities with an actionable plan to address current housing needs, identify future needs, and to create and preserve affordable housing through the manufactured housing. CU may provide technical assistance to communities and community organizations to access other state, federal, and private funds to leverage PRICE assistance.

- Resiliency: The community strategy plan will include proposed steps for addressing resiliency and disaster preparedness and recovery needs. Proposed steps may include repairs or improvements to community infrastructure, improvement or creation to community disaster shelters, or the creation or support of emergency response teams. The community strategy plan will include current and future resiliency and disaster response resources and steps for MHCs and MH households in the community. CU may provide MHCs with individualized resiliency and disaster response planning guides and resources in addition to the community strategy report.
- Communities may be referred to the CU Community Sustainability Team for leadership development and linkages to resources to address broadband infrastructure needs of MHC, MH residents, and the surrounding community.
- Household: Utilizing the data collected through the household interview and housing walkthrough and test results, CU will work with the MH household to develop an individualized preservation plan that includes an overview of the households housing stability and housing goals, as well as, immediate health and safety repair needs, disaster resiliency needs, future maintenance and housing system maintenance needs, and accessible resources to assist with preservation needs and repairs. Households may elect to continue their enrollment in the COME HOME program with access to our lending and wealth building and homeownership support activities below or to exit the program after receiving the individualized preservation plan. The individualized preservation plan will provide MH owners and residents with a clear understanding of their immediate housing needs and action steps for preserving and improving their current housing.

Wealth building and Homeownership Support: CU will provide Wrap-Around services for MHC residents and manufactured housing residents enrolled in COME HOME or residents of communities enrolled in COME HOME, including but not limited to housing and homebuyer education to prepare residents for homeownership and/or property or lot ownership and assist with housing retention. Wrap around services may include but are not limited to assistance with budgeting, goal setting, building savings for emergencies or down payments, connection to housing resources, or identifying and addressing credit issues. Wrap-Around services will be provided by CU staff trained in homebuyer education and housing counseling requirements by

nationally recognized housing intermediaries and training providers. CU may also connect MH households to USDA 502 and 504 housing loans through loan packaging or other state and federal programs through referrals.

- CU will offer in-person homeownership and homebuyer education classes in communities enrolled in COME HOME at least quarterly at no cost to LMI MH households and other LMI households. At least annually, CU will offer one of the in person education classes on manufactured housing maintenance, preservation, MH homeownership, chattel loans v. mortgages, and MH lot ownership.
- CU will develop online, accessible housing education classes utilizing our existing learning management system. Online classes will offer the same content as in-person classes. MH residents, MHC residents, and other LMI residents in communities enrolled in COME HOME will have no-cost access to our online housing education classes.
- MH and MHC residents may be referred to the CU Entrepreneurship Team to receive support in the development and sustainability of their small businesses.

#### Manufactured Housing Preservation:

- Infrastructure Repair or Improvement Lending: CU will establish a revolving loan fund for infrastructure repairs and improvements directly benefiting MH households. Site improvements for MHCs or multiple MH units may be considered infrastructure improvement. CU may provide communities enrolled in COME HOME that demonstrate the impact of these repairs or improvement on MH households and MHCs with access to low-interest loans for infrastructure repairs or improvements through PRICE Assistance. CU may provide loans through referrals to our environmental team or environmental lending programs or directly to communities with PRICE assistance. Communities receiving a low interest loan must demonstrate the repairs or improvements will improve the health, safety, or quality of life within the community, have direct benefit to LMI MH residents, that the upkeep of repairs or improvements is sustainable, and that infrastructure repairs or improvements will not increase or create cost burden to LMI MH households or residents of MHCs. Access to low-interest loan options may help communities improve health behaviors and social connections, while reducing exposure to health risks for individuals living in MH or MHCs while also impacting the community in general. For communities and MHCs meeting the above requirements and demonstrating their ability to fully fund the project, loans may be used for approved infrastructure repairs or improvements, pre-development cost of approved infrastructure repairs or improvements, or development cost for the same. MHCs receiving PRICE assistance for infrastructure improvement must agree to a period of affordability of fifteen years or for the life of the loan, whichever is longer, for impacted housing units. Applicants for loans for infrastructure repair or improvement activities will be referred to the CU lending department to complete a loan application. Applicants demonstrating need, impacting MH households, agreeing to affordability requirements, and with the ability to repay the loan per CU lending requirements may be eligible for a loan. Community non-profits or non-profit development organizations who have documented authorization from local municipalities or the MHC owners to undertake infrastructure repairs or improvements impacting MH households or MHCs may apply for a loan. Local municipalities must demonstrate approval to incur debt prior to loan approval. Municipalities must submit their procurement policy and documented efforts to follow

this policy in procurement for activities funded by PRICE assistance. Non-profits, community organizations, or MHC owners must submit three quotes or bids for services or document public posting of the RFQ and document adherence to their internal procurement policy to CU before loan distribution.

- Resiliency and Disaster Response: Communities and MHC enrolled in COME HOME may apply for low-interest loans to address resiliency and disaster response needs identified in housing needs assessment or community strategic plan. Resiliency and disaster response activities receiving PRICE assistance through low-interest loans must demonstrate that they have direct benefit to LMI MH residents, are sustainable, and are accessible to LMI MH households. An example of Resiliency or disaster response activities includes the repair or installation of tornado safe shelters or storm recovery centers in a central location within MHC or in walking proximity to MHCs or in municipal zones allowing manufactured housing within the community.
- Health and Safety Mitigation Repairs or Replacement Lending: CU will establish a revolving loan fund available to LMI MH residents and MH owners enrolled in the COME HOME program for health and safety mitigation repairs or replacement of pre-1976 MH units or MH units with health and safety needs that cannot be repaired or with repair costs that are more than the estimated replacement cost identified in the individualized preservation plan. CU may approve loans for some or all of the replacement cost of MH units if chattel loans or home mortgages are not accessible due to credit issues, are cost prohibitive, or would cause a housing cost burden to owners occupying the MH unit due to closing costs, interest rates, or other factors. Site improvements may be eligible for loans. Owners of manufactured housing units that use the housing unit as a rental property receiving PRICE assistance for health and safety mitigation repairs or replacement of MH units must agree to a period of affordability as defined below for impacted housing units. For loans provided to MH owners occupying the housing unit for health and safety mitigation repairs or replacement of MH units, the owner must agree to a period of affordability as defined below. CU will use the current COME HOME Repair program application to approve MH owners for initial applicant screening for income qualifications. Applicants must qualify as LMI for the area to qualify for the COME HOME program and loans. Applicants meeting this qualification will be referred to the CU lending department to complete a loan application. Applicants demonstrating need, ownership of the MH unit, agreement to affordability requirements, and ability to repay the loan per CU lending requirements may be eligible for a loan. MH owners may be required to complete financial planning, budgeting, or other homeownership education activities to qualify for a loan.
  - Resiliency and Disaster Preparedness: MH owners may use loans for resiliency and disaster preparedness activities that address needs identified in the individualized preservation plan. An example of a disaster preparedness activity would be the installation or repair of a tornado shelter.
- Preservation of Affordable Housing Community in Hugo, Oklahoma (Choctaw County Focus Area): CU owns an affordable manufactured housing community in Hugo, Oklahoma. Hugo is part of CU's organizational structure and holdings and is considered an not-for-profit manufactured housing community. Hugo consists of a mixture of owner occupied and renter households. CU owns all MH lots in the MHC and rents the slips

either to MH owners or as part of the total rent for MH rental units. CU will develop a housing taskforce consisting of residents of Hugo MHC, representatives of community housing and non-profit organizations, and other community stakeholders. The Hugo housing taskforce will assist CU in the development of homeowner strategies for residents living in the Hugo MHC.

CU will provide residents of owner-occupied manufactured homes in the Hugo MHC and MH residents and owners, and other MHC owners in the city of Hugo and Choctaw County, OK who elect to participate in COME HOME with housing assessments and testing, individualized preservation planning, and access to loans for health and safety mitigation repairs or replacement as described above. LMI MH households living in the Hugo MHC, the city of Hugo, or Choctaw County will have access to wealth building and homeownership support services and wrap-around services provided by CU. For Hugo MHC residents of owner-occupied units, the requirements for accessing loans and services will follow the same requirements and procedures as residents living outside of the Hugo MHC or the Choctaw County Focus Area.

The city of Hugo, municipalities of Choctaw county, other MHCs in Choctaw county will have access to infrastructure repair and improvement loans as described above.

CU will utilize PRICE assistance to assess the infrastructure repair and improvement needs of the Hugo MHC and health and safety repair and replacement needs of rental units owned by CU located in the Hugo MHC and create a preservation plan for addressing these needs. Assessments may include any or all the housing needs assessment resources identified above including the environmental and household tests. CU will then utilize PRICE funds to address needs identified in the preservation plan. Health and safety needs that constitute an immediate or imminent danger to the renter or community or may have long term health effects to the occupants, such as air quality, mold growth, and water safety, will be prioritized for repair or improvement activities. Infrastructure improvements may also include repairs and improvements to the current water and sewage system, lighting and other resident safety improvements, improvement to broadband access, and installation of solar panels or systems. CU will utilize our procurement policy that meets local, state, and federal requirements to obtain quotes and bids for goods and services required for the completion of this activity. Where applicable and in compliance with procurement standards, CU will utilize local vendors and community organizations for the completion of work for this activity. CU will maintain Hugo for the duration of our ownership of the property.

Timeline:

Year	Quarter	Grant Activity or Task	Milestones and Benchmarks
Y1	Q1	Environmental Review	<ul style="list-style-type: none"> <li>Initiate Environmental Review Process with HUD</li> </ul>

		Community Outreach and Engagement (Focus Areas)	<ul style="list-style-type: none"> <li>• Develop messaging and materials</li> <li>• Marketing in Focus Areas</li> <li>• Enroll communities in COME HOME</li> <li>• Initial Community Engagement Meetings</li> <li>•</li> </ul>
		Resident Outreach (Focus Areas and Hugo MHC)	<ul style="list-style-type: none"> <li>• Marketing to MH and MHC residents and owners</li> <li>• Enroll MH and MHC residents and owners in COME HOME</li> <li>• Initial meetings with MH and MHC residents and owners</li> </ul>
		Housing Taskforce (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Resident and Stakeholder Engagement <ul style="list-style-type: none"> <li>○ Application Process</li> </ul> </li> <li>• Initial Taskforce Meeting</li> </ul>
		Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Outreach to MH Renters and Owners</li> </ul>
		Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>• Planning Revolving Loan Fund</li> </ul>
		Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>• Planning Revolving Loan Fund</li> </ul>
		Staff Training and Development	<ul style="list-style-type: none"> <li>• New CU staff training and onboarding</li> <li>• Fair Housing Training</li> <li>• Annual CU Staff Training</li> </ul>
	Q2	Community Outreach and Engagement (Focus Areas and Enrolled Communities)	<ul style="list-style-type: none"> <li>• Marketing in Focus Areas</li> <li>• Enroll communities in COME HOME</li> <li>• Initial Community Engagement Meetings</li> </ul>
		Resident Outreach (Focus Areas and Hugo MHC)	<ul style="list-style-type: none"> <li>• Marketing to MH and MHC residents and owners</li> <li>• Enroll MH and MHC residents and owners in COME HOME</li> <li>• Initial meetings with MH and MHC residents and owners</li> </ul>
		Housing Taskforce (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Resident and Stakeholder Engagement <ul style="list-style-type: none"> <li>○ Application Process</li> </ul> </li> <li>• Initial Taskforce Meeting</li> <li>• Taskforce meeting at least quarterly</li> </ul>

		Housing Needs Assessment (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Begin community needs assessments</li> <li>• Begin household needs assessments <ul style="list-style-type: none"> <li>○ Resident interview</li> <li>○ Housing walkthrough assessment</li> </ul> </li> </ul>
		Strategic Planning (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Begin Community Strategic Planning Process</li> <li>• Begin Individualized Preservation Planning</li> <li>• Hugo Preservation Planning</li> </ul>
		Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Outreach to MH Renters and Owners</li> <li>• Begin In-Person Housing Education Classes</li> <li>• Individual household meetings as needed</li> </ul>
		Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>• Create application and underwriting guidelines for new revolving loan fund</li> </ul>
		Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>• Create application and underwriting guidelines for new revolving loan fund</li> </ul>
	Q3	Community Outreach and Engagement (Enrolled Communities)	<ul style="list-style-type: none"> <li>• Quarterly Community Engagement Meetings</li> </ul>
		Resident Outreach (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Owner/Renter Meetings- Progress and Check-in at least quarterly</li> </ul>
		Housing Taskforce (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Monthly Taskforce Meeting (In person at least quarterly)</li> </ul>
		Housing Needs Assessment (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Complete community needs assessments</li> <li>• Approval of Completed Community Needs Assessment by Taskforce</li> <li>• Community Presentation of Needs Assessment Report</li> <li>• Finalize Individual Needs Assessment</li> <li>• Review individual needs assessment with MH or MHC owner. For Rental Units- provide assessment to renter</li> </ul>
		Strategic Planning	<ul style="list-style-type: none"> <li>• Begin Community Strategic Planning Process</li> <li>• Approval of completed Community Strategy Plan by Taskforce</li> <li>• Community presentation of Community Strategy Plan</li> <li>• Provide TA to communities and community organizations</li> <li>• Begin Individualized Preservation Planning</li> </ul>



			<ul style="list-style-type: none"> <li>Review Individualized Preservation Plan with MH Owner</li> <li>Present Hugo Preservation Plan to CU Board of Directors for Approval and prioritization of activities</li> </ul>
		Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>Outreach to MH Renters and Owners (Ongoing)</li> <li>In-Person Housing Education Classes (Quarterly)</li> <li>Individual household meetings as needed</li> <li>Development of LMS classes (continue Q4)</li> </ul>
		Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>Loan Applications available for financing from Revolving Loan Fund</li> <li>Referrals to CU Lending</li> <li>Processing and approval of loans</li> <li>Disbursement of loans as applicable</li> </ul>
		Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>Applications available for Revolving Loan Fund</li> <li>Referrals to CU Lending</li> <li>Processing and approval of loans</li> <li>Disbursement of loans as applicable</li> </ul>
		Hugo Preservation Activities (Dependent on Environmental Review)	<ul style="list-style-type: none"> <li>Solicitation of bids or quotes for Health and Safety repairs</li> <li>Solicitation of bids or quotes for Health and Safety replacement units and installation activities</li> <li>Begin Health and Safety repairs and replacements as applicable</li> <li>Solicitation of bids or quotes for infrastructure improvements</li> <li>Begin infrastructure improvements as applicable</li> </ul>
	Q4	Community Outreach and Engagement (Enrolled Communities)	Quarterly Community Engagement Meetings
		Resident Outreach (Enrolled Communities and Hugo MHC)	Owner/Renter Meetings- Progress and Check-in at least quarterly
		Housing Taskforce (Enrolled Communities and Hugo MHC)	Monthly Taskforce Meeting (In person at least quarterly)
		Housing Needs Assessment (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>Approval of Completed Community Needs Assessment by Taskforce</li> </ul>

		<ul style="list-style-type: none"> <li>• Community Presentation of Needs Assessment Report</li> <li>• Finalize Individual Needs</li> <li>• Review individual needs assessment with MH or MHC owner. For Rental Units- provide assessment to renter</li> </ul>
	Strategic Planning	<ul style="list-style-type: none"> <li>• Begin Community Strategic Planning Process</li> <li>• Approval of Community Strategy Plan by Taskforce of completed plans</li> <li>• Presentation of Community Strategy Plan</li> <li>• Provide TA to communities and community organizations</li> <li>• Individualized Preservation Planning</li> <li>• Review Individualized Preservation Plan with MH Owner</li> </ul>
	Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Outreach to MH Renters and Owners</li> <li>• In-Person Housing Education Classes</li> <li>• Individual household meetings as needed</li> <li>• Development of LMS classes</li> </ul>
	Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>• Applications available for Revolving Loan Fund</li> <li>• Referrals to CU Lending</li> <li>• Processing and approval of loans</li> <li>• Disbursement of loans as applicable</li> </ul>
	Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>• Applications available for Revolving Loan Fund</li> <li>• Referrals to CU Lending</li> <li>• Processing and approval of loans</li> <li>• Disbursement of loans as applicable</li> </ul>
	Hugo Preservation Activities (Dependent on Environmental Review)	<ul style="list-style-type: none"> <li>• Solicitation of bids or quotes for Health and Safety repairs</li> <li>• Solicitation of bids or quotes for Health and Safety replacement units and installation activities</li> <li>• Begin Health and Safety repairs and replacements as applicable</li> <li>• Solicitation of bids or quotes for infrastructure improvements</li> <li>• Begin infrastructure improvements as applicable</li> </ul>

FY	Quarter	Grant Activity or Task	Milestones and Benchmarks	
Y2	Q1	Community Outreach and Engagement (Enrolled Communities)	Quarterly Community Engagement Meetings	
		Resident Outreach (Enrolled Communities and Hugo MHC)	Owner/Renter Meetings- Progress and Check-in at least quarterly	
		Housing Taskforce (Enrolled Communities and Hugo MHC)	Monthly Taskforce Meeting (In person at least quarterly)	
		Housing Needs Assessment (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>Finalize Individual Needs Assessment as needed</li> </ul>	
		Strategic Planning	<ul style="list-style-type: none"> <li>Finalize Strategic Planning</li> <li>Provide TA to communities and community organizations (ongoing)</li> <li>Finalize Individualized Preservation Planning</li> </ul>	
			Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>Outreach to MH Renters and Owners</li> <li>In-Person Housing Education Classes</li> <li>Individual household meetings</li> <li>LMS classes online</li> </ul>
			Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>Applications available for Revolving Loan Fund</li> <li>Referrals to CU Lending</li> <li>Processing and approval of loans</li> <li>Disbursement of loans as applicable</li> </ul>
			Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>Applications available for Revolving Loan Fund</li> <li>Referrals to CU Lending</li> <li>Processing and approval of loans</li> <li>Disbursement of loans as applicable</li> </ul>
			Hugo Preservation Activities (Dependent on Environmental Review)	<ul style="list-style-type: none"> <li>Continue Health and Safety repairs and replacements as applicable</li> <li>Continue infrastructure improvements as applicable</li> </ul>
	Q2		Community Outreach and Engagement (Enrolled Communities)	<ul style="list-style-type: none"> <li>Quarterly Community Engagement Meetings</li> </ul>
			Resident Outreach (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>Owner/Renter Meetings- Progress and Check-in at least quarterly</li> </ul>

		Housing Taskforce (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Monthly Taskforce Meeting (In person at least quarterly)</li> </ul>
		Housing Needs Assessment (Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Finalize Individual Needs Assessment (as needed)</li> </ul>
		Strategic Planning	<ul style="list-style-type: none"> <li>• Approval of Community Strategy Plan by Taskforce of completed plans (as needed)</li> <li>• Community presentation of Community Strategy Plan (as needed)</li> <li>• Provide TA to communities and community organizations (on going)</li> <li>• Finalize Individualized Preservation Planning (as needed)</li> <li>• Review Individualized Preservation Plan with MH Owner. For Rental Units-provide plan to renter (as needed)</li> </ul>
		Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>• Outreach to MH Renters and Owners</li> <li>• In-Person Housing Education Classes</li> <li>• Individual household meetings</li> <li>• LMS classes online</li> </ul>
		Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>• Referrals to CU Lending</li> <li>• Processing and approval of loans</li> <li>• Disbursement of loans as applicable</li> </ul>
		Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>• Referrals to CU Lending</li> <li>• Processing and approval of loans</li> <li>• Disbursement of loans as applicable</li> </ul>
		Hugo Preservation Activities (Dependent on Environmental Review)	<ul style="list-style-type: none"> <li>• Continue Health and Safety repairs and replacements as applicable</li> <li>• Continue infrastructure repairs and improvements</li> </ul>
	Q3/Q4	Community Outreach and Engagement (Enrolled Communities)	Quarterly Community Engagement Meetings
		Resident Outreach (Enrolled Communities and Hugo MHC)	Owner/Renter Meetings- Progress and Check-in at least quarterly
		Housing Taskforce (Enrolled Communities and Hugo MHC)	Monthly Taskforce Meeting (In person at least quarterly)
		Housing Needs Assessment (Enrolled Communities and Hugo MHC)	Not applicable to Q3/Q4

	Strategic Planning	<ul style="list-style-type: none"> <li>Finalize Community Strategic Planning Process (as needed)</li> <li>Provide TA to communities and community organizations (on going)</li> <li>Finalize Individualized Preservation Planning (as needed)</li> </ul>
	Wealth Building and Homeownership Support (Focus Areas/Enrolled Communities and Hugo MHC)	<ul style="list-style-type: none"> <li>Outreach to MH Renters and Owners</li> <li>In-Person Housing Education Classes</li> <li>Individual household meetings</li> <li>LMS classes online</li> </ul>
	Infrastructure Repair or Improvement Lending	<ul style="list-style-type: none"> <li>Referrals to CU Lending</li> <li>Processing and approval of loans</li> <li>Disbursement of loans as applicable</li> </ul>
	Health and Safety Mitigation Repairs or Replacement Lending	<ul style="list-style-type: none"> <li>Referrals to CU Lending</li> <li>Processing and approval of loans</li> <li>Disbursement of loans as applicable</li> </ul>
	Hugo Preservation Activities (Dependent on Environmental Review)	<ul style="list-style-type: none"> <li>Continue Health and Safety repairs and replacements as applicable</li> <li>Continue infrastructure repairs and improvements</li> </ul>

Each community engaged in COME HOME for Manufactured Housing Preservation will be engaged in a two-year process as outlined above. Communities may be enrolled in COME HOME during any year before the third quarter of year 6. During year 3, CU may expand our marketing and enrollment to communities outside the initial focus area. CU may replicate and expand services to secondary focus areas identified using the criteria defined in Visions and Goals section of Exhibit D and leverage the efforts of existing CU teams in these areas to reach underserved and disadvantaged communities. Projects will be finalized by the close of Q2 of year six. Quarters three of year six will be used for close out meetings with communities and MH households. CU will complete reporting as required by HUD and will complete internal program evaluations annually.

**Budget:**

	Total
Personnel	\$2,353,104.00
Fringe Benefits	\$588,276.00
Travel	\$152,000.00
Supplies	\$96,000.00
Other Direct Costs	\$211,625
Environmental and Home Testing	\$200,000
Repair Revolving Loan Fund	\$3,000,000
Infrastructure Revolving Loan Fund	\$3,000,000
Hugo MHC Health and Safety Repairs	\$100,000

Hugo MHC Infrastructure Improvements	\$250,000
Indirect Cost	\$832,411
<b>Total</b>	<b>\$10,850,801</b>

100% of the proposed budget will be provided through the HUD PRICE grant. CU may provide similar COME HOME activities in our rural communities in our service area to households not living in manufactured housing using other funding.

Expense	Minimum # of Participants	Projected Cost Per Community	Estimated Cost Per Household Benefiting from PRICE
Assessments, Planning, and Education Services	65 Communities	\$65,175	\$218
Environmental and Home Testing	65 Communities	\$3,0774	\$10.25
Repair Revolving Loan Fund	150 Households	N/A	\$20,000
Infrastructure Revolving Loan Fund	20 Communities	\$150,000	\$25
Hugo MHC Health and Safety Repairs	20 Households	N/A	\$4,545
Hugo MHC Infrastructure Improvements	40 Households	\$6,250	\$6,250

CU made the following assumptions about participating communities:

- Average community size of rural communities to be enrolled in COME HOME: 5,000
- Average household size: 2.5 persons
- 15% of household live in rural communities live in manufactured housing
- CU will serve at least one community in each of the 65 counties in our focus areas
- 750 individuals will be eligible for PRICE assistance per community or population of 5,000 (15% of households)

Projected Impact: The CU 7-state service area includes 45% of all persistent poverty communities in the United States. With poverty rates at or above 20% of the population, household incomes are often too low to support unsubsidized housing. Across our footprint, rural communities are facing housing supply shortages, increased development cost, disparities in available funding for affordable housing development in rural communities, lack of construction trade workers and a lack of local community banks providing competitive mortgages. Manufactured housing is a viable and important solution for many of the housing issues our rural communities face. The COME HOME activities described above will provide rural communities with access to funding and resources to preserve existing MH and MHCs and to repair or improve infrastructure impacting existing and future MH residents in their communities.

The development of a revolving loan fund for both infrastructure repairs and improvements as well as MH health and safety repairs, provides access to much needed financial resources to underserved rural communities, MHCs and MH households. The housing needs assessments and strategy reports will help COME HOME communities understand their housing needs beyond a

general awareness, prioritize their affordable housing goals and efforts, and make strategic decisions about housing development and the preservation or replacement of MH and MHCs. CU will provide wrap-around, housing education services that promote homeownership, housing retention, and wealth building for LMI households living in manufactured homes. CU will serve at least one community in each of the 65 counties in our focus areas through the COME HOME assessment, planning, and education activities, impacting at least 19,500 household living in manufactured housing at an average cost of \$218 per household. Through the assessment process, CU will provide communities with environmental and home hazard testing to identify and mitigate the impact of natural and manmade hazards entering the home. CU will provide testing in 65 communities with an average cost of \$3,077 per community or \$10.25 per household eligible for PRICE assistance.

The rural communities that CU serves face a lack of subsidized and unsubsidized housing options for low-income renters and homebuyers. Lower average incomes and higher rates of poverty compound housing need in these underserved areas. MH is often more affordable than traditional, site-built homes and may be naturally occurring affordable housing options for rural communities. The preservation of MH and MHCs resulting from CUs assessment, planning, and loan process will help stop the loss of affordable housing in rural areas due to declining habitability of aging homes and MHs. MH and MHCs receiving PRICE assistance through COME HOME may also see increased resiliency and disaster recovery through health and safety repairs such as insulation, fortified roof repairs, and energy efficient windows and the installation and repair of household and community storm shelters.

CUs preservation efforts for the Hugo MHC will preserve approximately 20 naturally occurring affordable manufactured housing units. Although Hugo MH are affordable without a subsidy, CU accepts housing vouchers for rent and lot rent from the Hugo Housing Authority and Choctaw Nation Housing Authority. Individuals living in Hugo MHC will likely experience increased quality of life due to health and safety assessments, repairs or replacements. Improvements to the infrastructure in the MHC will also provide CU the opportunity to plan for expansion of available housing in the Hugo MHC through the installation of affordable volumetric modular homes for home ownership and are projected to impact 40 households in future development.

### **Affordability and Equity**

Ensuring The Availability of Affordable Manufactured Housing: Loan for Repairs for Owner Occupied MH Units: Owners of owner-occupied MH units may qualify for a loan of up to \$20,000 for health and safety repairs or to assist with the cost of replacement of pre-1976 MH units. Loans will be for a term of 15-20 year with an interest below market rate. The loan should not increase the borrower's debt-to-income ratio over 46%. A deed restriction for the life of the loan will be filed with the local courts limiting resale price of the home or the home and property to the purchase price or, if available, the current appraisal price at the time of the loan plus twenty percent. If the MH owner also owns the slip or property on which the housing unit is located at the time of the loan, the deed restriction would apply to the housing unit and property. If the borrower agrees to a deed restriction of 30 years, they may qualify for a reduction of the interest rate by 1.5%.

Renter Occupied Housing Units: Owners of MHCs or multiple MH units may qualify for a loan of up to \$20,000 per affordable MH unit with a maximum loan of \$100,000. Loans will be for a term of 15-20 year loan with an interest rate below market rate. A deed restriction requiring any MH unit receiving PRICE assistance to remain affordable for households at 80% AMI for the life of the loan will be filed with the local courts. If borrower agrees to a deed restriction of 30 years, they may qualify for a reduction of interest rate by 1.5%.

Infrastructure Repair of Improvement Loans: Owners of MHCs or multiple MH units, non-profit or housing development organizations, and municipalities may qualify for a loan for up to \$150,000 with a term of up to 30 years with an interest rate below market rate for infrastructure repairs or improvements as described in the activities section of Exhibit D.

A deed restriction requiring any MH unit receiving PRICE assistance to remain affordable for households at 80% AMI for the life of the loan will be filed with the local courts.

Municipalities receiving PRICE Assistance must demonstrate that infrastructure repairs or improvements are for the benefit of MH residents and that repairs or improvements do not negatively impact MH households through unreasonable cost increase for utilities or create other cost burdens for MH households or other LMI residents. For the life of the loan, municipalities must demonstrate, through a rate study or other tool, the need and reasonableness for rate increases for any infrastructure component repaired or improved with PRICE assistance. If a municipality utilizes an infrastructure loan for the improvement of land for the installation of MH units or the creation or expansion of a MHC, the municipality must require that the MH meet affordability standards for ownership or rent by using the deed restrictions described above.

Hugo MHC Preservation: All units and MH lots for rent in the Hugo MHC that are repaired or improved by PRICE assistance will remain affordable to households at 80% AMI during while under the ownership of CU. All MH or Modular Housing Units in the Hugo MHC installed during future development of the MHC as a result of infrastructure repairs or improvements benefiting from PRICE assistance will maintain affordability to households at 80% AMI or will be sold to LMI households.

Resident Protections: For MHC rental units where the residents of the MH unit rents the unit and/or the pad, the owner must maintain or adopt tenant site lease protections consist with or greater than those required by Fannie Mae or Freddie Mac. CU will maintain these standards for the Hugo MHC. At minimum, the owners of MHCs must meet the requirements below:

- One-year renewable lease term unless there is good cause for non-renewal
- 30-day written notice of rent increases
- 5-day grace period for rent payments and the right to cure defaults on rent payments
- Right to sell the manufactured home without having to first relocate it out of the community
- Right to sell the manufactured home in place within a reasonable time period after eviction by the manufactured housing community owner
- Right to sublease or assign the pad site lease for the unexpired term to the new buyer of the tenant's manufactured home without any unreasonable restraint
- Right to post "For Sale" signs



- Right to receive at least 60 days' notice of planned sale or closure of the manufactured housing community

At minimum, the owners of MH rental units must meet the requirements below:

- One-year renewable lease term unless there is good cause for non-renewal
- 30-day written notice of rent increases
- 5-day grace period for rent payments and the right to cure defaults on rent payments
- Right to receive at least 60 days' notice of planned sale of the manufactured housing unit

Access To Resources and Financing: CU will preserve MH as an affordable housing solution in rural communities prioritizing efforts in persistent poverty counties that advance projects that meet the needs of underserved communities and intentionally build systems and processes benefiting LMI households living in MHCs and MH. Following best practices for affirmatively affirming fair housing and affirmative fair marketing, CU will engage rural communities and the individuals and families living and working in these areas. Through our affirmative fair marketing plan, CU will engage populations across the deep south that are least likely to access housing services, lending, and other community services. The housing taskforce of each COME HOME community will include representation of MH households, minority households, and households that are least likely to access housing services and lending opportunities. CU will provide housing opportunities to LMI households across our service area at no cost to the participants. CU will provide in-person and on-line self-paced housing education classes to assist LMI families to stabilize their current housing situation, prepare for successful repayment of loans, and to become homebuyer ready. As broadband access and quality is limited in many rural areas, CU will provide access to housing education materials in hard copy for LMI households in the CU service area and allow participants to attend individual meetings in person, online, or by phone. All forms for the COME HOME program will be available in English and Spanish, in hard and electronic copy, and will be made accessible for LMI and LEP persons and can be translated to other languages as needed. CU will provide translation services without cost to the program participants. When available, CU will conduct group meetings with communities or participants in person and through live streaming.

For lending products, CU will allow submission of documents in person, online, or by mail. CU staff may assist applicants with understanding loan applications and loan requirements in clear and concise language. CU may consider credit history, credit score, or alternative credit documentation to ensure that LMI applicants have fair and equitable access to lending opportunities.

CU will provide referrals to our Entrepreneurship Team for LMI individuals and small businesses focused on building or housing trades living and working in enrolled communities and surrounding areas. When applicable, CU will encourage local, small business, black owned, LMI owned, minority owned, and/or women owned business to bid on projects. CU may provide support to small or entrepreneur owned business through the Entrepreneurship team and minority owned business through the Arkansas Minority Business Development Agency operated by Communities Unlimited.

## **Environment and Resilience**

Significant Hazards: Strong wind events including tornadoes, flooding, and extreme temperature events are significant natural hazards that could impact project sites within the CU service area. The contamination of drinking water sources through natural or man-made hazards may also

impact project areas. Although expected annual loss as documented in the FEMA national risk index is often projected very low or relatively low in rural communities as a result of less concentration of assets, physical structures, and population in comparison to urban areas, the social vulnerability scores of rural and persistent poverty communities in the CU footprint are more likely to be relatively or very high. Households in socially vulnerable areas are more susceptible to the adverse impacts of natural hazards, including disproportionate death, injury, loss, or disruption of livelihood.

**Strong Wind Events:** Loans provided through the revolving loan fund identified in Exhibit D, can be utilized by communities, MHC, and MH owners for the installation of tornado shelters, the improvement or repair of foundations, elevation of MH units located in flood zones or coastal flood areas, installation or repair of anchors, and other FEMA recommended preventative safety and hazard mitigation measures.

**Flooding:** Loans provided through the revolving loan fund identified in Exhibit D, can be utilized by communities, MHC, and MH owners for the installation of tornado shelters, the improvement or repair of foundations, elevation of MH units located in flood zones or coastal flood areas, improvement of waste water infrastructure systems, site improvements to prevent or mitigate flooding or other natural hazards resulting from flooding, and other FEMA recommended preventative safety and hazard mitigation measures.

**Extreme Temperature Events:** Loans provided through the revolving loan fund identified in Exhibit D, can be utilized by communities, MHC, and MH owners for the installation of insulation or other weatherization activities, repair or improvement of water system components to repair or prevent damage caused by cold temperature events, the installation or repair of energy efficient heating or cooling systems, and other FEMA recommended preventative safety and hazard mitigation measures.

**Drinking Water Contamination:** The COME HOME team may provide communities, MHCs, and MH owners utilizing private wells with drinking water tests and assessments to determine if the drinking water to MHCs or MH homes is clean and safe per EPA standards and that the water systems are functioning properly and meet the water demands of the community or household. CU may make direct referrals of rural communities to the CU environmental team for further testing, TA, and mitigation resources. Loans provided through the revolving loan fund identified in Exhibit D, can be utilized by communities, MHC, and MH owners for repairs or improvements to water systems.

During the community housing needs assessment process, CU and the housing taskforce will review existing local hazard mitigation plans for communities enrolled in COME HOME. Where a mitigation does not exist or if an existing plan needs updated to include mitigation plans for MHCs and MH, CU may provide technical assistance to the community in the development or revision of a mitigation plan following the principles and processes established by FEMA. Individualized preservation plans for MH owners will include the identification of significant hazards, preventative measures, and available hazard mitigation resources for homeowners.

Current and Future Threat: Many of the significant hazards impacting the CU service area as described above are natural hazards resulting from extreme weather events. CU will work with communities and MHC and MH owners, and MH residents to identify potential threats from natural hazards such as high winds or tornadoes, extreme temperatures, and flooding and will create a strategic or individualized preservation plan that includes steps to prepare for natural disasters and extreme weather events, mitigate potential damage, and recover from weather-related hazards. In addition to providing assessments and planning that will address extreme weather conditions, COME HOME will provide access to capital resources through the COME HOME revolving loan funds for infrastructure repairs and improvements and household repairs and improvements. COME HOME loans will allow communities and MH owners and residents to mitigate the impact of wind events such as tornadoes, flooding, and extreme temperatures through the activities described in the paragraphs above. Additionally, the revolving loan products can be used for the improvement or installation of safety measures and resources such as the installation of tornado shelters, repair or improvement of community spaces for cooling and heating centers or evacuation centers following disaster events.

For LMI households, loans may be used for elevating or relocating MHs located in flood zones or that have been subjected to repeated loss as a result of flooding or other natural disasters. CU housing education classes and materials will include resources on reducing or mitigating the effects of extreme weather events, low cost weatherization activities, the benefits of insuring MH units, property, and personal property, and steps to follow after a natural or manmade disaster to access state and federal recovery resources and programs.

In the marketing of loans provided for infrastructure and MH repairs CU will reference and encourage the use of weather resistant and climate appropriate materials appropriate for the area in which the materials will be used. For example, marketing of loans in rural and persistent poverty communities in coastal flood areas may reference mold resistant materials, elevation of MH, and other materials used in the repair or prevention of water damage. In areas with risk of high winds or tornados, marketing may reference the use loan funds for high wind or hurricane rated housing anchors, tornado shelters, fortified roofs, or other tornado resistant materials. CU will encourage the use of energy efficient and climate resistant materials in all loan funded projects. In completing repairs and improvements of both the infrastructure and MH units in the Hugo MHC, CU will utilize weather resistant and climate appropriate materials when available and applicable to the conditions and needs of the area.

Environmental Justice: CU works to address the intersection points between environmental and housing justice. Housing quality directly effects the environment that families live and work in daily, including air quality, water quality, and the quality/health of built structures, and the environmental and housing implications of a natural disaster. Many rural communities lack the capacity or resources to identify and address issues within the built environment. Utilizing our comprehensive Housing Needs Assessment, CU helps communities, MHC, and MH households identify, plan for, and address the issues that fall within the intersection points of housing and environmental justice. By working within persistent poverty communities, specifically those minority-majority populations, we serve the communities most likely to experience

environmental and housing disparities. The COME HOME program improves protections from and resilience to environmental harms such as severe weather and wind events, extreme temperature events, and flooding through our assessment, planning, and lending services. CU will provide loan products for communities and MHCs serving LMI manufactured housing residents and to MH owners for activities such as installation of community or individual tornado shelters, fortification of MH through anchoring, weatherization of MH owned or inhabited by LMI individuals or households, floodproofing of MH, and wastewater infrastructure repairs or improvements.

## **Community Engagement**

Diverse Stakeholder Participation: CU will organize a housing taskforce in each community enrolled in COME HOME. The taskforce will consist of a diverse group of stakeholders from within the community. Taskforce members will include manufactured housing and MHC residents and may include representatives from local government, non-profits, community and housing development organizations, resident or tenant advocacy groups, and building trades professionals. CU will also engage state fair housing organizations, housing associations, CDFIs, banks, manufactured housing associations, and other housing stakeholders within the region and to serve on or provide guidance to each housing taskforce. The taskforce will reflect the diverse cultural, racial, and economic makeup of each community. CU will utilize affirmative fair marketing strategies to engage rural, minority, and low-income communities in the formation of the housing taskforce, strategic planning, and decision-making process.

CU will engage state manufactured housing associations to participate in the review and revision of local housing code and ordinances that impact the placement or preservation of MH and MHCs at the state and local level. In 2023, CU served 762 rural communities, impacting 1,061,128 rural community members, and leveraged over \$174 million dollars in funding. CU maintains relationships with rural leaders for years. Through the outlined PRICE related work, CU will build on the positive reputation and relationships we have developed in rural communities through the work of our multiple teams that engage and collaborate with local government and community leaders in efforts to preserve manufactured housing while also addressing the unique cultural history, perceptions, and needs within the community. Through careful facilitation of conversations, planning, and decision making, which includes a diverse group of stakeholders reflective of community demographics in the South, CU will guide communities in overcoming the barriers described in Exhibit C of the application.

Existing Community Plans: During the community assessment process, CU and the housing taskforce will review the existing comprehensive plans, land use plans, housing plans, fair housing plans, and any other plans and policies that impact MH and MH residents in the community or communities across the project area. Through this process, CU and the taskforce will identify any barriers to successful preservation of manufacture housing or negative impact on MH residents caused by existing plans or policies and will work with community stakeholders and manufactured housing associations to create strategic plans that include recommendations for changes to current plans or policies.

Exhibit E Capacity  
Communities Unlimited

## **Factor C: Capacity**

Project Management Experience: Communities Unlimited is managing \$16.4 million in community development projects in FY2024. For its work this year, CU secured 102 revenue sources, mostly federal funds through USDA, EPA, SBA, and HHS to implement rural community development projects across Texas, Oklahoma, Arkansas, Louisiana, Mississippi, Alabama and Tennessee. CU is successfully managing community development projects across all seven states of its footprint utilizing a 5-year grant totaling \$XYX secured through the Office of Community Service at the Department of Health and Human Services. CU has excellent financial systems in place that start with each employee tracking their time to the quarter hour per grant source which then flows to our finance department that allocates the corresponding expenses to each grant source utilizing the MIP accounting software. Each quarter CU reports on every federal grant, providing a budget to actual expense statement. Each month CU's leadership team reviews the status of each grant looking at the rate of spenddown in relation to the grant metrics achieved.

Grant Funds Experience:

Key Staff:

**Ines Polonius:** Chief Executive Officer of Communities Unlimited, joined the organization in 2014. Ms. Polonius will serve as the Authorized Official (AO) on this proposed project. Ms. Polonius has been active in national and international economic development for more than 30 years and has dedicated her career to accelerating community economic development in persistently poor, rural places in the South. She directly supports a senior leadership team and oversees a team of over 90 staff. She received a Master of Business Administration degree and a Master of Economics degree from Boston University along with a certificate in Public and Not-for-Profit Management. She earned a Bachelor of Science degree from Georgetown University.

**Audra Butler:** CU's Area Director of Housing will manage the implementation of all activities of CU organizations to ensure that this project is successful and all objectives and measurable quantifiable metrics are met. She joined CU in 2022. Before joining CU, Ms. Butler served as the Interim Director and Senior Director of Strategic Initiatives at the Fayetteville Housing Authority and its component non-profit development, FHA Development, Inc. She also served as the Chief Operations Officer for Community Programs at a community action agency in central Arkansas, directing operations in nine counties and expanding the organizations homeless services and transitional living program. Ms. Butler previously served as the President of the Arkansas Balance of State Continuum of Care, coordinating grants and projects for homeless assistance partners across 46 counties in Arkansas and is a current board member of the ACHANGE, the only statewide affordable housing advocacy organization in Arkansas. Audra is a graduate of Arkansas Tech University with a dual degree in History and Political Science and Master's of History from Arkansas Tech University and has completed course work in public service management and research at Clinton School of Public Service.

**Kimberly Griffey:** CU's Chief Financial Officer joined CU, Inc. in June 1995. Ms. Griffey is a CPA and before joining CU, she worked as an Audit Supervisor, specializing in governmental and not for profit auditing, with a regional public accounting firm for five years. She is a

member of the American Institute of Certified Public Accountants, and the Arkansas Society of Certified Public Accountants. She received her MBA from the University of Arkansas in 2005 and she is a 1989 graduate of Arkansas State University with a Bachelor of Science degree. Her responsibilities include directing the financial staff, overseeing all financial aspects of the organization including preparation and monitoring of the corporate budget, overseeing the annual audit, and preparation of the annual tax returns.

**Joanna Moore, CPA:** CU's Grants Coordinator will serve as the primary grants compliance management officer for this project to ensure that all activities are compliant with the grant agreement and with the provisions set forth in CFR 200. She joined CU, Inc. in June 2015 as their Staff Accountant before transitioning to her current Grants Coordinator in 2021. Her responsibilities include overseeing a diverse portfolio of over \$11 million in grants and contracts and is responsible for compliance with financial deadlines. Ms. Moore received her Masters of Accountancy degree and her Bachelor of Science degree from the University of Arkansas in 2015. In 2019 she became a CPA and joined the American Institute of Certified Public Accountants and the Arkansas Society of Certified Public Accountants.

**Kapriskie Mack:** Community Housing Technician at CU. Kapriskie is a seasoned professional with a diverse background spanning community housing, sales enablement, customer support, and veteran affairs. Kapriskie leads the delivery of housing services to rural communities while also providing technical assistance and strategic planning for housing initiatives. Kapriskie holds a Master of Divinity and Public Administration. Kapriskie is currently working with communities in the Arkansas Delta Region and works closely with the COME HOME housing repair program in Dumas, AR.

**Denika Smith-Scott:** Housing Counseling Technician at CU. Denika has experience in grant coordination, higher education and teaching, and property management. She holds a Master of Education. Denika is currently working in the Arkansas Delta Region, providing home buyer and housing education services and activities.

**Experience Promoting Racial Equity:** At CU, we understand that the US housing system is built on exclusion and racism compounded by a lack of resources and access in rural, persistent poverty areas. Persistent poverty is directly linked to systemic racism, with the Mississippi Delta, Alabama Black Belt, the colonias, and Tribal country being some of the least upwardly mobile places in the developed world. CU incorporates the racial histories of communities to understand patterns of segregation, disadvantage, and service gaps within the communities. Our teams sustain deep, meaningful engagement with Black, Brown, and Indigenous community members to ensure that racial equity and justice are the center of our processes. In addition to identifying and filling service and resource gaps in housing, community development, and access to clean water, CU operates the Arkansas Minority Business Development Agency (MBDA), focusing on minority business enterprises and growth opportunities. Led by our DEI work group, CU is taking a deep dive into how we reflect the communities we serve, addressing generations of disparities created by racism and directly impacting our black, brown, and indigenous neighbors. From regular employee surveys and training to inclusive, equitable hiring practices, CU actively addresses the history of inequality in our service area while developing further measures to ensure we create and maintain a foundation built on justice, equity, diversity, and inclusion.

### Experience Completing Environmental Reviews:

Cross-cutting Federal Requirements: CU ensures that it maintains excellent financial health by having monthly, quarterly, and annual review of financial statements by the board and Senior Leadership Team. CU uses MIP Fund Accounting to report on all segments of its business and we use Nortridge Loan Software to maintain our loan program database, track customer servicing/impact and provide management with timely reports.

CU has implemented a monthly operations leadership meeting where the CEO, CFO and the Senior Leadership team meets with the Operation Leadership Team (OLT) to review each funding source individually to review program deliverables, requirements, and status. Each member of the OLT presents the status of the grants/contracts they are responsible for and update the entire team on program successes and challenges. Cooperatively the team celebrates successes and works together to overcome challenges. After the OLT meeting the CEO, CFO and Senior Leadership team review detailed financial reports and loan reports. Financial reports include the standard Statement of Financial Position and Statement of Activities and a "Grant Calculation Dashboard" that gives each Senior Leader a quick review of where they stand on overall spending on each of their funding sources. We also review our Corporate Dashboard that starts by addressing our available liquid cash position and forecasting our income cash flow and cash flow needs for the next 6 months. Part of this review is to ensure that we have adequate unrestricted funds available to meet required match on current grants and the availability of funding to meet match requirement on potential applications. The second page of the dashboard zeroes in on the funds available and needed for our Lending activities and we review the breakdown of our Net Income (Loss) so we have a clear understanding of exactly how each of our programs are contributing (or not) to our overall profitability. The Dashboard clearly shows our deployment ratio, Loan Fund net asset ratio and the cost of funds broken down between our Environmental and Small Business portfolios. Loan reports include new loans, delinquencies, and any problem loans. The Board of Directors receive a detailed financial report each quarter including our dashboard and a report from the Loan Fund. The Board also meets with the auditors each year to review and approve the audit.

CU is audited each year according to the single audit (A-133) procedures in accordance with Generally Accepted Auditing Standards and Government Auditing Standards. CU ensures segregation of duties by requiring two signatures on every disbursement and reviewing every disbursement by at least one person outside of the program making the purchase.

In August of each year the Budgeting process is kicked off with the CEO, CFO and Senior Leaders reviewing the salaries of all current employees to determine the annual raise percentage and the need for additional staff. With this information the CFO prepares a individual baseline budget for each Program Director based on known revenue streams and known expenses. The baseline budget is then forwarded to each Program Director for them to review and provided additional information regarding additional budget needs. Once the Program Directors have completed their review and approval the CFO combines all the budget into a consolidated budget. The consolidated budget is then presented to the Board of Directors for their review and approval.



CU's housing staff completes fair housing training at least annually. CU follows fair housing standards in providing housing services and referrals providing equal opportunity and access to our wrap-around services, financing, and homeownership opportunities. CU is an Equal Opportunity Lender, providing lending services pursuant to the Equal Credit Opportunity Act.

CU will not oversee the contracting or subcontracting of labor for public construction programs through PRICE assisted activities; however, if PRICE assisted COME HOME activities directly implemented and managed by Communities Unlimited result in the contracting or subcontracting of labor for projects to which Davis-Bacon and other related acts apply, CU will require contractors or subcontracts with contracts of more than \$2,000 to pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area and adhere to any overtime requirements. In these instances, CU will monitor compliance through payroll records.

COME HOME activities will not include the acquisition of real property and the relocation of persons from their homes or businesses as a result of the acquisition, rehabilitation, or demolition applicable to 49 CFR 24 (Uniform Relocation Act).

Exhibit F Match or Leverage  
Communities Unlimited

**Factor (d) MATCH OR LEVERAGE**

Match and Leverage: CU understands that the PRICE award does not require a match. However, CU will utilize the following funds and resources to expand upon the work funded by PRICE.

CU is a member of the Rural WORTH Collaborative, a group of seven CDFIs serving rural and native communities in persistent poverty areas. As a subgrantee of the Rural WORTH Collaborative Funding through Wells Fargo, CU will receive \$171,000 in funding from FY2025 through FY 2027 to support CU’s housing efforts. CU will use these funds to leverage the PRICE assistance and provide COME HOME services to rural households not living in manufactured housing. The breakdown of funding is below.

April 2025	\$68,400
April 2026	\$68,400
April 2027	\$34,200
Total	\$171,000

CU is the owner of the Hugo MHC. The Hugo is an affordable manufactured housing community that is self-sustaining and generates modest program income that is reinvested in the maintenance and improvement of the MHC.

Funding Risk: COME HOME is a sustainable and established housing model developed by and currently implemented in rural communities in the Arkansas Delta region. COME HOME does not currently focus on manufactured housing when completing assessments, planning, or resource development activities in rural communities. A reduction in the grant award for CU’s application for the PRICE NOFO may result in CU serving fewer rural communities in the CU service area or providing fewer health and safety repair loans or infrastructure improvement loans during the life of the grant. If CU is not awarded the PRICE funding, COME HOME will continue to serve rural communities in the CU service area and will scale across our service area as possible by future funding opportunities. In our current housing work in the Delta Region, CU has partnered with a local entrepreneur, job skills program, and housing development organizations to develop an affordable volumetric modular housing manufacturing center. Through this work, CU has developed a network of partners that support manufactured housing as affordable housing solutions. CU will continue to leverage these linkages to provide manufactured housing residents with resources for the preservation of their homes and communities.

Exhibit G Long-term Effect  
Communities Unlimited

## **Factor (e) LONG-TERM EFFECT**

CU's COME HOME program will preserve the affordability of manufactured homes through deed restrictions and affordability requirements tied to the approval of infrastructure and home repair loans. The required affordability measures will keep PRICE assisted manufactured homes affordable for LMI households for 15-30 years. The deed restriction will require a minimum affordability period of fifteen years, preserving the affordability of manufactured homes in the community for households at or below 80% AMI. CU will work with local MH owners and housing authorities to:

- Ensure that repairs of MH meet the housing quality standards for federally subsidized programs, preserving decent, safe, and sanitary homes for low and very low-income households benefiting from the availability of public housing vouchers.
- Review availability of vouchers for manufactured home space rental in compliance with PIH 2017-18 and HUD housing assistance payment contracts.
- Review the availability and local policy for housing choice vouchers for home ownership that are available for the purchase of manufactured housing.

CU will assist community partners such as local housing authorities in reviewing and strengthening their approach to manufactured housing affordability but also ensure that deed restrictions securing affordability of assisted manufactured housing units for 15-30 years keep manufactured housing in these rural communities affordable for LMI households lessening the need for federal subsidies.

COME HOME will promote homeownership in rural communities to residents of manufactured housing through housing education opportunities and linkages to affordable lending and subsidies for homeownership. The COME HOME housing education technicians will provide group and one on one education opportunities to identify residents' barriers to homeownership and assist LMI residents in becoming homebuyer ready. CU is a leading partner and member of the steering committee for Partners for Rural Transformation and a member of Wells Fargo's Wealth Opportunities Realized through Homeownership (WORTH) Rural collaborative. Along with these partners and collaboratives, CU is working to create wealth building and homeownership opportunities across our service area and the creation of 5,000 new homeowners of color in rural communities over the next three years. CU seeks to leverage the PRICE Award with WORTH resources to promote homeownership among MH residents. Affordable manufactured housing preservation is key to overcoming housing development and availability barriers for families living in rural areas.

Come Home will inject much needed resources and capital into persistent poverty rural communities, increasing opportunity and investment into affordable and accessible manufactured housing. Through COME HOME, CU will focus on communities with high minority populations significantly impacted by systemic racism exhibited in public policy and housing programs as well as systemic disinvestment that has led to persistent poverty.

In addition to providing funding for infrastructure and MH repairs, COME HOME will require each community to ensure equity and housing justice in the formation of their housing taskforce,

so that planning, decision making, MH preservation initiatives do not perpetuate gaps in homeownership rates, barriers to affordable housing, community segregation, and other side effects of systemic racism in the housing market.

Housing both influences and is influenced by the built environment, impacting the overall health and well-being of individuals, families, and communities. In recognition of this relationship, CU's housing work is an intentional and integral part of the organization's environmental initiatives. Through the assessment process, CU will provide communities and MH households with access to testing and screening to identify environmental hazards affecting MH residents, guide planning for strategic and individualized preservation plans, and connect MH owners, residents, and communities to funding and resources to mitigate these hazards. CU's assessment, planning, education, and lending services will ensure families have access to affordable, safe manufactured homes, allowing them to thrive within their homes.