

NARRATIVE EXHIBITS

Exhibit A: Executive Summary

The Lumbee Tribe of North Carolina (LTNC), through its nonprofit organization Lumbee Land Development Inc. (LLD), proposes the Lumbee Manufactured Housing Improvement Program (LM-HIP). LTNC is not eligible for a DUNS registration due to its status as a State Recognized Tribe; therefore, LTNC created LLD to obtain a DUNS registration and apply for federal grants. LLD is wholly operated and controlled by LTNC.

The LM-HIP, an \$11 million HUD PRICE project, will address housing needs for 405 LTNC households in the project area, all of which is Lumbee tribal territory: Cumberland, Hoke, Robeson, and Scotland counties in North Carolina. The LM-HIP project vision is to provide affordable, safe, and sanitary housing options for eligible low-to-moderate income (LMI) Lumbee Indian families living in the project area.

Specifically, during this project, an experienced team of project managers, housing professionals, and tribal staff members will perform the following activities:

- Indirect services, including consultations, assessments, education, and advising
- Home rehabilitation (200 homes at \$25,000 each)
 - Rehabilitation of homes through repairs to floors, roofs, HVACs, and bathrooms
 - Abating and mitigating mold, lead, and other health hazards (including pests such as termites and fire ants) in homes with moisture problems and leaks
- Home weatherization (150 homes at \$10,000 each)
 - Weatherizing homes by replacing old windows, doors, and HVAC units
 - Increasing R-values by increasing insulation in walls, floors, and roofs of homes to cope with extreme heat and cold from climate change
 - Regularizing inspections and replacement/repair of anchors and tie-downs of homes for increased safety during high winds, hurricanes, and tornadoes
- Home mitigation (35 homes at \$15,000 each)
 - Elevating homes above the floodplain
 - Elevating HVAC units for continued safe use during extreme weather conditions
- Home replacement (20 homes at \$75,000 each)
 - Replacing dilapidated mobile homes
- Home relocation credit and MHC lot rent vouchers to prevent evictions of “homesite renters” (50 homes at \$20,000 each)
 - Relocating homes as necessary out of trailer parks or floodplains with land acquisition assistance and/or home transport and setup costs
- Home ownership assistance (25 members at \$20,000 per applicant)
 - Providing down payment assistance for renters to become homeowners

Some of the households/homes served during the proposed project will benefit from more than one activity.

In addition, a significant component of the proposed project will be financial education to prepare at least 100 LTNC households for homeownership. Additionally, financial education will be a requirement for all LTNC households receiving services under LM-HIP, so that all LTNC families participating in any of the PRICE activities will learn to create and understand their monthly budget, including how their debt-to-income ratio should affect their saving and spending rates for optimal financial freedom. They will understand what public and private home financing opportunities are available to them to fund not only home purchase but also maintenance and repair over decades of living in the same house. Five-year forgivable loans will be used to support repair and climate change mitigation activities.

The final outcomes of the proposed project will include 405 LTNC households benefiting from these activities, as well as 200 homes repaired/rehabilitated, at least 235 homes moved out of floodplains or otherwise strengthened against the effects of climate change via weatherization procedures and related activities, 20 new homes provided to tribal members by this project, at least 50 homes relocated via land acquisition assistance and/or home transport and setup costs, and 25 households receiving down payment assistance for home ownership. The useful lives of these new, repaired, and purchased homes, and therefore their affordability, will be 30+ years; as a result, the impacts of this project will be felt in our communities for more than three decades after it ends.

Exhibit B: Threshold Requirements and Other Submission Requirements

Threshold Requirements

1. Resolution of Civil Rights Matters

The LTNC and its subsidiary LLD do not have any unresolved civil rights matters.

2. Timely Submission of Applications

This application was submitted prior to the deadline.

3. Eligible Applicant

As a Native American tribal organization with a UEI number, the LLD—a subsidiary of the LTNC—is an eligible applicant. See the Eligible Applicants documentation in Attachment D.

4. Number of Applications

This is the only application the LLD, as a subsidiary of the LTNC, has submitted under this NOFO. Our target project area will not be assisted by more than one PRICE grant.

Other Submission Requirements

1. Standard Application, Assurances, Certifications and Disclosures

Standard Form 424 (SF-424) Application for Federal Assistance

A completed SF-424 form is part of this application.

Assurances (HUD 424-B)

A completed HUD 424-B form is part of this application.

Federal Assistance Representations and Certifications

The Federal Assistance Representations and Certifications section of the LLD, a subsidiary of the LTNC, has been completed. It is completed every time we renew our SAM.gov registration.

Budget Form (424-CBW)

A completed 424-CBW budget form is part of this application.

Assurances for Construction Programs (SF-424D)

A completed SF-424D form is part of this application.

Assurances for Non-Construction Programs (SF-424B)

The SF-424B form is not applicable to this application.

Applicant Disclosure Report Form 2880 (HUD 2880)

Please choose one statement:

The HUD 2880 form is not applicable to this application.

Disclosure of Lobbying Activities (SF-LLL)

A completed SF-LLL form is included with this application.

Certification of Lobbying Activities

We have included the Certification of Lobbying Activities form.

Code of Conduct

Lumbee Land Development, Inc.—a subsidiary of the LTNC—is listed on HUD’s website with a Code of Conduct submission date of January 23, 2020. If and when that Code of Conduct is updated, the LLD will send the updated version to HUD within an appropriate timeframe.

Affirmatively Furthering Fair Housing

See Attachment C, the required Affirmatively Furthering Fair Housing narrative.

2. Other Program-Specific Requirements

a. Fair Housing and Nondiscrimination

The LTNC and its subsidiary LLD will comply with 24 CFR 1003.601 during the proposed project.

b. Limited English Proficiency (LEP)

The LTNC and its subsidiary LLD will take reasonable steps to provide meaningful language access to persons with LEP participating in any program, activity, or service funded under this NOFO pursuant to Title VI of the Civil Rights Act of 1964.

c. Physical Accessibility.

All LTNC tribal facilities are ADA-compliant. Notices and other written communications via email, websites, or hardcopies are provided in ways that persons with hearing impairments, visual impairments, and other communication-related disabilities can access. American Sign Language interpreters are used to accommodate persons with hearing impairments who use ASL when necessary.

The LTNC is accustomed to providing accessible and reasonable accommodations to individuals with disabilities to encourage their full and active participation in tribal activities. We will ensure that this will also be true of the activities of this proposed project by following Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) and HUD’s implementing regulations for Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) at 24 CFR part 8, Title II of the Americans with Disabilities Act (42 U.S.C. §§ 12131-12134) and the implementing regulations at 28 CFR part 35, and all other applicable laws and regulations.

d. Environmental Review.

Every activity associated with the proposed project will be performed in compliance with the National Environmental Policy Act (NEPA), the language of which is located at <https://ceq.doe.gov/>, as well as related Federal and state environmental laws. The LTNC and its subsidiary LLD plan to assume environmental responsibilities under 24 CFR part 58.

e. Affordability.

As a tribal applicant, we define “affordable rents” using the Indian Housing Block Grant standards for useful life and affordability standards. The Lumbee Tribe plans to maintain affordability of housing in the four-county project service area for at least the next 30 years using financial education, land acquisition and/or down payment assistance, and housing rehabilitation, repair, weatherization, mitigation, relocation, and replacement as elements of our complex and carefully considered long-term approach, which aligns closely with both our Chairman’s long-term housing goals and our tribe’s Indian Housing Plan (IHP).

The proposed LM-HIP project will address the affordability of rents in the context of the affordability of lot rents for mobile homes. Those tribal members who have undergone the LM-HIP application process and who have been selected for assistance during this project will have the opportunity to receive a home relocation credit and/or MHC lot rent vouchers to prevent evictions of “homesite renters” as one of LM-HIP’s main project activities: relocating homes as necessary out of trailer parks or floodplains with land acquisition assistance, down payment assistance, and/or home transport and setup costs.

Exhibit C: Need

The Proposed Project Area and the Need for Affordable Accessible Housing Within It

The project area for the proposed HUD PRICE project is the region composed of Cumberland, Hoke, Robeson, and Scotland counties in North Carolina. These four contiguous counties also comprise the Lumbee Tribe's tribal territory and service area.¹ Per the North Carolina Department of Administration's list of NC Tribal Communities,

The Lumbee Tribe is the largest tribe in North Carolina, the largest tribe east of the Mississippi River and the ninth largest in the nation. The Lumbee take their name from the Lumber River originally known as the Lumbee, which winds its way through Robeson County. The more than 55,000 members of the Lumbee Tribe reside primarily in Robeson, Hoke, Cumberland and Scotland counties. Pembroke is the economic, cultural and political center of the tribe.

. . . In 1887, the state established the Croatan Normal Indian School, which is today the University of North Carolina at Pembroke. A variety of enterprises including an industrial park, farming, small businesses and the University contribute to the economy.²

Per the first and only amendment to the Lumbee Constitution,³

The territory of the Lumbee Tribe of North Carolina shall include Robeson, Hoke, Scotland and Cumberland Counties, North Carolina.

This territory is also defined as the tribal service area, as these four North Carolina counties are the ones with the highest concentration of Lumbee members. Although the community of Pembroke is the center point of the tribe, there are other areas throughout the four counties that became Lumbee communities as they were established with a church and school—often, the same building serving as both the church and school. This came from our history: Indians were not allowed to attend white or black public schools, so we had to develop our own schools to educate our children. Naturally, small Lumbee communities were formed around the schools and churches. Today, these communities are still present and considered Lumbee ancestral lands with deep roots in our tribal history and culture.

Per the “History and Culture” page on the Lumbee Tribe website,

The ancestors of the Lumbee were recognized as Indian in 1885 by the State of North Carolina. In 1956, Congress recognized the Lumbee as an Indian tribe while denying the People any federal benefits that are associated with such recognition – an action that the Lumbee continue to fight today.

¹ <https://www.lumbee-tribe.com/history-and-culture>; <https://www.doa.nc.gov/divisions/american-indian-affairs/nc-tribes>.

² <https://www.doa.nc.gov/divisions/american-indian-affairs/nc-tribes>.

³ The Lumbee Constitution. Available at https://3aa0349e-a4c3-4857-8f0a-2e7e416fac87.filesusr.com/ugd/756e16_72e7de6efe2f40549c0c49fcc88c8ad3.pdf.

Lumbee tribal headquarters are located in the small town of Pembroke. The tribal territory and service area is comprised of four adjoining counties: Robeson, Scotland, Hoke and Cumberland. The tribal housing complex, also known as ‘The Turtle’, houses most tribal services. The Lumbee are a strong People with a dynamic history and promising future.⁴

Among the efforts that have contributed to that dynamic history and promising future have been and continue to be the efforts of the LTNC Housing Department, which the proposed activities are designed to extend and supplement.

A notable difference between those earlier efforts and the proposed activities is that LM-HIP will not create new or rehabilitate existing housing *communities*, as several of LTNC’s earlier housing efforts did; instead, LM-HIP will provide clients with rehabilitation, weatherization, mitigation, and replacement services for their manufactured housing units based on individual applications for assistance from various locations within the four-county service area.

Importantly, considering the extent of current speculation in land development for purchased or rental properties and the current practice of buying mobile home parks only to raise lot rent beyond what residents can reasonably afford, one of our project activities will involve relocating homes as necessary out of trailer parks or floodplains with land acquisition assistance and/or home transport and setup costs to protect our neediest tribal members from being trapped in financial and/or housing situations for which they have few or no exit strategies.

History of Housing Efforts (and the Continuing Need)

The LTNC has considerable experience with administering Indian Housing Block Grant (IHBG)⁵ and Native American Housing and Self Determination Act (NAHASDA) funds. The LTNC has received funds from NAHASDA’s IHBG program since its inception. The Tribal Government in its current form was initiated in 2001 and has administered the IHBG funds since then. Despite its status as a state-recognized tribe, the LTNC is eligible for NAHASDA funds because it received Indian Housing Funds through the 1937 Housing Stock Indian housing programs (the precursor to NAHASDA). The LTNC has been using NAHASDA funds for rehabilitation of manufacturing housing since it began its Housing Department in 2001.

The lack of adequate housing options throughout the LTNC service area is substantial. This great need is only partly filled by NAHASDA funds—which is the motivation for this proposal.

The continuing need for safe, sanitary, and affordable housing in the four-county service area is shown via the facts and figures below, which are from HUD’s Formula Allocation Needs Data (FY 2023)⁶:

⁴ <https://www.lumbee Tribe.com/history-and-culture>.

⁵ https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg.

⁶ <https://ihbgformula.com/FRFinalAllocationFY2023/Lumbee%20Tribe%20of%20North%20Carolina.pdf>.

1. There are 2,995 American Indian/Alaskan Native (AIAN) households with a housing cost burden greater than 50% of the household's annual income.
2. There are 960 AIAN households identified as overcrowded or without kitchen or plumbing.
3. There is a current housing shortage of 11,726 homes (derived from the number of low-income AIAN households less the total number of NAHASDA and Current Assisted Stock).
4. There are 4,491 AIAN households with an annual income less than or equal to 30% of the national median income.
5. There are 3,341 AIAN households with an annual income between 30% and 50% of the national median income.
6. There are 4,006 AIAN households with an annual income between 50% and 80% of the national median income.
7. There are 68,731 AIAN people living in the LTNC formula area.

The numbers above include both manufactured and stick-built homes. Since 2001, LTNC has completed 360 home replacements, 340 of which were manufactured home replacements (the rest were older stick-built houses so dilapidated that they could not be rehabilitated). In the past, approximately 47% of all homes served by NAHASDA funding were manufactured homes. There is currently a waiting list for housing rehabilitation and repair. Approximately 250 tribal members throughout the four-county project service area are waiting for home rehabilitation; of that number, 94 homes are manufactured homes.

The proposed project will extend and supplement the efforts of the LTNC Housing Department by addressing the need for safe, sanitary, and affordable housing by repairing, rehabilitating, weatherizing, elevating, and/or relocating existing manufactured homes or replacing dilapidated ones with new ones; the proposed project will also encourage affordable homeownership by providing financial education as well as forgivable loans and other kinds of financial assistance toward land acquisition or toward transporting and setting up the mobile home in a more long-term situation that mitigates the home against future flood waters and/or offers a chance for homeowners to also own their own land (i.e., and not be subject to arbitrary/predatory lot rent increases).

The 960 AIAN households identified as overcrowded or without kitchen or plumbing will also benefit from this grant's programs of housing options for eligible Lumbee members. By offering them manufactured housing solutions and down payment assistance for new homes, those Lumbee families who may have been living with family members due to the costs related to renting, purchasing, or maintaining a home will be able to live on their own. This in turn will decrease the number of households with overcrowding issues inside the LTNC service area.

Specific Relevant Needs: Cumberland County, NC

Cumberland County—the 20th largest county in the state by total area—encompasses 652.6 square miles of land. Its population of 334,728 is composed of 1.3% American Indians or Alaska Natives; 41.8% Whites; 25.1% Black or African Americans; 13% Hispanics or Latinos; 2.5% Asians; 0.4% Native Hawaiians and Other Pacific Islanders; and Two or more races, 11.4%.⁷

⁷ United States Census Bureau, 2020.

The median household income in 2022 was \$58,110 (across all races), compared with \$36,731 for AIAN households in the county and \$67,481 across the entire state.⁸ The employment rate for 2022 was 47.3%, compared with 59.2% in North Carolina.⁹ The 2022 poverty rate for Cumberland County was 16%, but for North Carolina, it was 12.8%.¹⁰ An estimated 196 of 935 AIAN families (or 21%) were living below the poverty rate in 2022.¹¹

In 2020, there were 142,175 housing units, 128,978 of which were occupied and the remainder (13,197) vacant.¹² In 2020, approximately 55.5% of Cumberland County residents owned their own homes, as opposed to 66.7% of North Carolina residents.¹³ In 2022, 72% of occupied housing units in Cumberland County had two or three bedrooms; 21.1% had four or more bedrooms.¹⁴ Of those units occupied by American Indian/Alaskan Native (AIAN) households in 2000, 1.3% lacked complete plumbing facilities and 0.8% lacked complete kitchen facilities.¹⁵ The average family size in Cumberland County in 2022 was 3.04 people, compared to 3 people in North Carolina.¹⁶ In 2020, 272 of 1163 AIAN owner-occupied homes (23.4%) and 210 of 1009 AIAN renter-occupied homes (20.8%) in Cumberland County had households of four or more people.¹⁷

Specific Needs: Hoke County, NC

Hoke County's population of 52,082 is composed of 7.2% American Indians or Alaska Natives; 42.4% Whites; 33.5% Black or African Americans; 14.7% Hispanics or Latinos; 1.4% Asians; 0.1% Native Hawaiians and Other Pacific Islanders; and 8% Two or more races.¹⁸

In 2022, 18.1% of Hoke County's residents were disabled, which was higher than North Carolina's 13.7% rate. Also, 11% of the county's residents were without health care coverage in the same year.¹⁹

Its median household income in 2022 was \$57,141 (across all races) but \$47,159 for AIAN households, compared with \$67,481 across the entire state.²⁰ The employment rate for 2022 was 48.4%, compared with 59.2% in North Carolina.²¹ The 2022 poverty rate for Hoke County was

⁸ 2022 American Community Survey 1-Year Estimates.

⁹ 2022 American Community Survey 1-Year Estimates.

¹⁰ 2022 American Community Survey 1-Year Estimates.

¹¹ 2022 American Community Survey 5-Year Estimates.

¹² United States Census Bureau, 2020.

¹³ United States Census Bureau, 2020.

¹⁴ 2022 American Community Survey 1-Year Estimates.

¹⁵ United States Census Bureau, 2020.

¹⁶ 2022 American Community Survey 1-Year Estimates.

¹⁷ United States Census Bureau, 2020.

¹⁸ 2022 American Community Survey 5-Year Estimates.

¹⁹ 2022 American Community Survey 5-Year Estimates.

²⁰ 2022 American Community Survey 1-Year Estimates.

²¹ 2022 American Community Survey 1-Year Estimates.

17.3%, much higher than the overall rate for North Carolina: 12.8%.²² An estimated 173 of 807 AIAN families, or 21.4%, were living in poverty in 2022.²³

In 2020, there were 20,083 housing units in Hoke County, 18,590 of which were occupied and 1,493 vacant. While the 2022 homeownership rate was 69.9% in Hoke County, greater than the 66.7% rate across North Carolina, the housing values were revealing: 39.8% of the housing units were worth less than \$149,999. Also, 97.2% of the housing units had two or more bedrooms (69.6% had two or three bedrooms, while the remaining 27.6% had four or more bedrooms).²⁴ Additionally, the average family size in Hoke County in 2022 was 3.54 people, as opposed to the average family size of 3 people across the entire state that same year.²⁵ Of the housing units occupied by AIAN families, 30 (of 1218) lacked complete plumbing facilities.²⁶ In 2020, 286 of 984 AIAN owner-occupied homes (29%) and 113 of 405 AIAN renter-occupied homes (28%) had households of four or more people.²⁷

Specific Needs: Robeson County, NC

The largest county in the state, Robeson County is predominantly rural, with a total area of 951 square miles and a diverse population of 116,530 composed of 39.7% Native Americans; 24.4% Whites; 23.3% African Americans; 9.8% Hispanics/Latinos; 4.4% Two or more races; 1% Asians; and 0.1% Native Hawaiians and Other Pacific Islanders.²⁸ Over 70% of Robeson County's population is composed of Native Americans, African Americans, and Hispanics, groups that are reported at a higher risk for experiencing health disparities.²⁹

Most Lumbee tribal members reside in Robeson County, which is one of the most economically distressed counties in North Carolina. The reported median income of Robeson County residents from the 2021 ACS 1-Year Estimates Data is \$37,008; the median household income for North Carolina is \$61,972. Most of Robeson County's population (42%) identify as American Indians or Alaska Natives (AIAN). The median income of AIAN households in Robeson County is \$34,385. AIAN individuals below the poverty rate in Robeson County is 26%, compared to 17.7% for white residents and just 13.4% for the State of North Carolina. As of 2020, 3331 of 11,909 AIAN owner-occupied (28%) and 1120 of 4552 AIAN renter-occupied homes (24.6%) had households of four or more people.³⁰

One in three Robeson County residents live in poverty, with 18.5% lacking health insurance coverage.³¹ As an example of the economic stressors affecting homeownership in the county, in 2020, 26.9% of the housing units in Pembroke, location of the University of North Carolina at Pembroke, were owner-occupied; this percentage had declined from the previous year's rate of

²² 2022 American Community Survey 1-Year Estimates.

²³ 2022 American Community Survey 5-Year Estimates.

²⁴ 2022 American Community Survey 5-Year Estimates.

²⁵ 2022 American Community Survey 5-Year Estimates.

²⁶ United States Census Bureau, 2020.

²⁷ United States Census Bureau, 2020.

²⁸ United States Census Bureau, 2020.

²⁹ Robert Wood Johnson Foundation County Health Rankings 2019.

³⁰ United States Census Bureau, 2020.

³¹ United States Census Bureau, 2020.

30.8%.³² The median housing value in Robeson County is \$70,000. In comparison, the median housing value in North Carolina is \$140,000. Within Robeson County, Lumber Bridge has the highest median housing value: \$131,000. Rowland has the lowest median housing value: \$60,000.

According to the National Housing Preservation Database, Robeson County has 4,481 affordable housing units. Most of the affordable housing is located within Lumberton. Other units are located in near Maxton, Red Springs, and Fairmont.³³

Specific Needs: Scotland County, NC

Scotland County has 319.1 square miles of land and is the 79th largest county in North Carolina by total area.³⁴ The total population of Scotland County was 34,174 in 2022—11.5% American Indian or Alaska Native, 41.7% White, 39% Black or African American, 0.4% Asian, 0% Native Hawaiian or Other Pacific Islander (the six people represented by this could not be represented statistically to one significant digit), and 5% Two or more races.³⁵

The median household income in the county was \$41,948 in 2022 across all races but \$51,377 for AIAN households; employment was 46.7%, and 12.3% of the county's residents were without health care coverage. In 2022, an estimated 836 of 3807 AIAN families (or 22%) were living in poverty, compared to an estimated 1961 of 13,361 White families (14.7%).³⁶

There were 14,348 total housing units in Scotland County in 2020; 12,870 were occupied and 1,478 vacant.³⁷ The homeownership rate was 59.8% in 2022; fully 70.5% of the housing units were valued at less than \$149,999.³⁸ Per U.S. Census data from 2020, 5 of AIAN-occupied housing units (of a total of 1008) lacked complete plumbing facilities; fully 183 of 810 AIAN owner-occupied homes (22.6%) and 108 of 505 AIAN renter-occupied homes (21.4%) had household sizes of four or more people.³⁹

Overall Need for Housing Assistance in the Four-County Project Service Area

The above data, presented county-by-county, show that there is a significant need for housing assistance throughout the entire four-county project service area.

In addition, the overall LTNC geographic area is classified as distressed by the State of North Carolina with Robeson County being Tier 1 (highly distressed and rural) and a 65.1 regional

³² 2021 American Community Survey 5-Year Estimates.

³³ United States Census Bureau, American Community Survey 5-year Estimates (2011-2015), Table B25002, "Occupancy Status"; Table B25003, "Tenure"; Table B25024 "Units in Structure"; Table B25077, "Median Value (Dollars)." National Housing Preservation Database.

³⁴ United States Census Bureau, 2020.

³⁵ 2022 American Community Survey 5-Year Estimates.

³⁶ 2022 American Community Survey 5-Year Estimates.

³⁷ United States Census Bureau, 2020.

³⁸ 2022 American Community Survey 5-Year Estimates.

³⁹ United States Census Bureau, 2020.

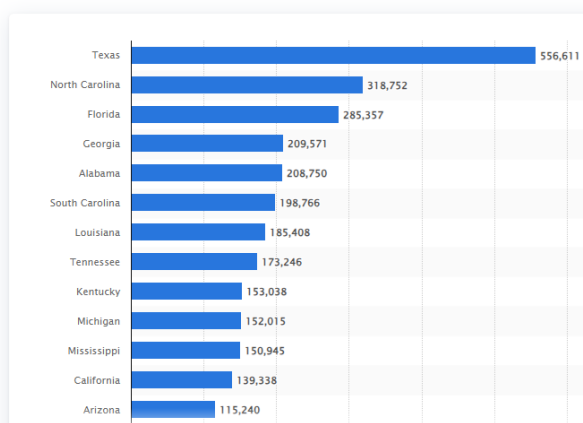
rating by U.S. Department of Commerce Economic Development Administration Distress Measurement.⁴⁰

The region is overburdened and has high environmental and social justice concerns. According to the Justice40 Climate and Economic Justice Screening Tool, this four-county project area has significant housing needs and disparities compared to the county and the state. Housing costs are at the 45th percentile (share of households making less than 80% of the area median family income and spending more than 30% of income on housing). This area is also predominantly low-income, at the 80th percentile for income (people in households where income is less than or equal to twice the federal poverty level, not including students enrolled in higher ed) and 84th percentile for poverty (share of people in households where income is at or below 100% of the Federal poverty level). Unemployment for this area is at the 67th percentile (number of unemployed people as a part of the labor force).⁴¹

An additional community need indicator beyond low income, poverty, and unemployment rates is health insurance coverage. North Carolina is one of only 13 remaining states with no Medicaid Expansion, which significantly limits the ability to access essential services. Also, as medical costs rise, people have to make difficult choices regarding their spending on the basics—food, clothing, and shelter—versus their healthcare; these are particularly grim choices for lower-income people to face.

Also, per the Statista Research Department (and shown below in a screen capture, North Carolina was the state with the second-highest number of mobile homes in the US as of September 2023.⁴² This statistic reveals the tremendous wealth disparities that exist in North Carolina—the home of Charlotte, one of the nation’s most important financial and banking centers, and the Research Triangle Park, one of the nation’s most noteworthy R&D, education, and artistic and cultural centers and one that is named repeatedly in the top five in lists of “fastest-growing metros in the nation.”

Number of manufactured housing units in the United States as of September 2023, by state



⁴⁰ <https://www.commerce.nc.gov/grants-incentives/county-distress-rankings-tiers>.

⁴¹ <https://screeningtool.geoplatform.gov/>.

⁴² <https://www.statista.com/statistics/1038637/states-with-most-mobile-homes-usa/>.

Finally, a company called Time-Out Properties has recently come into the project area, bought trailer parks, made minor upgrades, and increased lot rents significantly (as similar companies have done nationwide as part of the national speculation in housing that has raised and continues to raise housing prices, including rental prices). Many people caught in this situation cannot afford the cost of relocating their manufactured home, so they are having to find some way of dealing with this new cost burden⁴³. A significant portion of our proposed project addresses helping our Tribal members prepare for homeownership so that they are not caught in similar financially burdensome situations with few to no exit strategies.

The proposed LM-HIP project will address the housing needs of the Lumbee tribal members from this four-county area by providing repairs, rehabilitation, weatherization, mitigation, and replacement of mobile homes as well as financial education toward homeownership.

Distress Criteria

The four-county area served by this project—Cumberland, Hoke, Robeson, and Scotland counties in North Carolina—meets the distress criteria defined in 12 CFR 1805.201(b)(3)(ii)(D) in terms of poverty rates, median incomes, population losses, and unemployment rates.

	Poverty Rate ⁴⁴	Median Income ⁴⁵	Population Loss ⁴⁶	Unemployment (April 2024)
Cumberland Co.	18%	\$50,746	0.3% increase ⁴⁷	4.4% ⁴⁸
Hoke Co.	17.9%	\$53,456	1.4% increase ⁴⁹	4.0% ⁵⁰
Robeson Co.	27.3%	\$36,736	0.8% increase ⁵¹	4.6% ⁵²
Scotland Co.	26.1%	\$39,866	0.1% increase ⁵³	5.8% ⁵⁴
National Average	13.7%	\$60,516	1.04% increase ⁵⁵	3.9% ⁵⁶

Along with the continuing displacements resulting from the recent hurricanes in 2016 and 2018, these data show the financial pressures that residents of the four-county project area are enduring. In too many cases, these pressures are preventing tribal members from moving into

⁴³ <https://spectrumlocalnews.com/nc/triangle-sandhills/news/2019/04/16/residents-upset-after-lot-fees-double>; <https://www.wunc.org/news/2019-05-06/after-matthew-and-florence-a-mobile-park-ownership-company-is-hiking-rents-and-issuing-evictions>; <https://www.robsonian.com/news/117050/mobile-home-park-buyouts-chicken-farms-concern-commissioners/amp>; <https://apnews.com/article/aef0fa3c1d154fd9531fc7100da5431>.

⁴⁴ <https://datausa.io/profile/geo/north-carolina>.

⁴⁵ <https://datausa.io/profile/geo/north-carolina>.

⁴⁶ <https://carolinademography.cpc.unc.edu/2024/03/18/75-nc-counties-have-grown-in-population-since-2022/>.

⁴⁷ <https://carolinademography.cpc.unc.edu/2024/03/18/75-nc-counties-have-grown-in-population-since-2022/>.

⁴⁸ <https://analytics.nccommerce.com/NC-Today/Local-Unemployment-Rates.php>.

⁴⁹ <https://carolinademography.cpc.unc.edu/2024/03/18/75-nc-counties-have-grown-in-population-since-2022/>.

⁵⁰ <https://analytics.nccommerce.com/NC-Today/Local-Unemployment-Rates.php>.

⁵¹ <https://carolinademography.cpc.unc.edu/2024/03/18/75-nc-counties-have-grown-in-population-since-2022/>.

⁵² <https://analytics.nccommerce.com/NC-Today/Local-Unemployment-Rates.php>.

⁵³ <https://carolinademography.cpc.unc.edu/2024/03/18/75-nc-counties-have-grown-in-population-since-2022/>.

⁵⁴ <https://analytics.nccommerce.com/NC-Today/Local-Unemployment-Rates.php>.

⁵⁵ <https://www.macrotrends.net/global-metrics/countries/USA/united-states/population-growth-rate>.

⁵⁶ <https://www.bls.gov/news.release/laus.nr0.htm>.

their own homes (this is particularly true for young adults who wish to have their own households) or for building the substantial savings necessary for homeownership.

More recently, post-COVID inflation and the ratio of housing stock to renters and buyers has increased the overall cost of housing both nationwide and in the four-county project service area. Many economically or financially distressed households are currently looking to manufactured housing as a more affordable option, but they may fail to understand that the long-term effects of lending for manufactured homes can come with higher interest rates due to lenders' need to provide "chattel loans," which are

loans to purchase movable personal property in which the property, or chattel, [provides security for] the loan and the lender holds an ownership interest These loans tend to carry higher interest rates and have fewer built-in consumer protections than regular mortgages.⁵⁷

First-time homebuyers tend not to take these higher interest rates into account, nor do they tend to understand the costs inherent in manufactured housing maintenance and upkeep (having previously become accustomed to contacting the landlord or property management company when maintenance or upkeep are needed).

Also, these distressed areas do not always offer employment opportunities that will allow families to move out of poverty. With the average cost of a conventional (stick-built) home standing at today's inflated rates (and increasing daily), families living in poverty have very little options besides chattel loans on mobile homes that may or may not (but typically do not) include land. As a result, these families are at significant risk of eviction if lot rents are raised too high to be affordable—and eviction from a lot means having to find thousands of dollars within a month or two to move the mobile home to a more affordable location and set it up there, thousands of dollars that these low-income families most often do not have.

Increasing Resilience in Disaster-Prone Areas

The target geographic area is not in or part of a Community Disaster Resilience Zone, but Scotland County and Robeson County are considered "moderate" on the National Risk Index⁵⁸.

Community risks due to extreme weather and natural disasters include flooding, heat, and severe storms, especially high winds from hurricanes, being located roughly only 90 miles inland from the three highest-risk North Carolina coast locations for hurricanes: Morehead City, NC, Wilmington, NC, and Cape Fear (part of the Outer Banks of North Carolina)⁵⁹. In fact, North Carolina is the third most hurricane-prone state in the U.S., experiencing an average of 2.25 major storms per year⁶⁰. As an example, Robeson County was devastated by Hurricane Matthew

⁵⁷ <https://www.investopedia.com/terms/c/chattelmortgage.asp>.

⁵⁸ <https://www.fema.gov/flood-maps/tools-resources/risk-map>.

⁵⁹ <https://moreheadcitync.org/CivicAlerts.aspx?AID=144>; <https://fris.nc.gov/fris/Home.aspx?ST=NC>;
<https://www.msn.com/en-us/weather/topstories/north-caroline-most-dangerous-place-for-hurricanes/ar-AA1nELOr#>;
<https://hurricanecity.com/rank.htm>.

⁶⁰ North Carolina State Climate Office. North Carolina Tropical Cyclone Statistics, 1851-2022.

in 2016 and Hurricane Florence in 2018, precipitating a housing shortage that left many families in hotels or with relatives. Between 400 and 500 homes were damaged or destroyed by the storms. According to the North Carolina Housing Coalition, 29% of Robeson County households are housing-burdened, meaning these families spend 30% - 50% of their household income solely on housing. As a result, nearly half of all county renters and 20% of homeowners have difficulty affording their homes. The North Carolina Climate Science Report emphasizes community adaptation over community abandonment and relocation. The proposed project presents one such community adaptive strategy to mitigate the significant impacts of climate change.

An example of the threat of climate change, as shown via North Carolina's new Flood Risk Information System (FRIS)⁶¹ database, is the following screen capture showing the four-county project area and its flood zones (shown in gold):



During the proposed LT-HIP project, the LTNC will use this website as well as FEMA data regarding flood risk to help determine which mobile homes owned by tribal members applying for project services will need to be raised a minimum of 24 inches above the flood line.

Our proposed activities during this housing project—home rehabilitation, weatherization, mitigation, replacement, and relocation, along with indirect services including consultations, assessments, education, and advising—are designed to provide greater resilience for the four-county project area, enabling the LTNC to ease housing burdens for its members.

Barriers to Manufactured Housing Preservation or Revitalization in the Project Area

The first and greatest barrier to manufactured housing preservation or revitalization in the four-county project area is the low availability of financing to purchase units and/or lots. Many times, the financing available is only for land/home packages with high interest rates and high closing costs. A second significant barrier is the concentration of poverty in the project area per the

⁶¹ <https://fris.nc.gov/fris/Home.aspx?ST=NC>.

American Community Survey (ACS) database⁶², which has led to poor credit among the people who need safe, affordable housing the most. A third significant barrier is distrust of lenders due to decades of prejudicial lending practices, so that even people who might be able to afford homes are wary of unethical practices including discrimination in access to municipal services, which has over time exacerbated the concentration of poverty in the project area.

A new program addressing that third barrier—the Discrimination Financial Assistance Program (DFAP), funded via the current administration’s Inflation Reduction Act—has recently become available⁶³. DFAP, prompted by a class-action lawsuit against the USDA because many past Black and brown families literally lost the family farm due to prejudicial and predatory lending practices, seeks to ameliorate individual families’ situations by providing reparations. Unfortunately, even though these and other corrections to structural racism and its effects now exist, many tribal members’ lack of trust in conventional banks and lending institutions in the four-county project area is deep-seated, as that lack of trust is substantiated by decades of experience. The LTNC understands this lack of trust and therefore serves as a trusted lender in the housing space for its members.

During the proposed project, the Lumbee Tribe of North Carolina will implement financial education programming to address all three major barriers: the low availability of financing, the severe concentration of poverty, and the significant lack of trust in conventional banks and other housing lenders.

We currently offer a financial education program to LTNC household members aimed at helping them ready themselves for homeownership via understanding how home financing works, budgeting in order to build savings toward a down payment, the importance of having a reserve for maintenance and repairs, the various costs and fees associated with buying a home, and refinancing options to take when interest rates drop, home values rise, or other factors reveal that refinancing has indeed become an attractive possibility. We will extend this set of activities to the target beneficiaries of the proposed project during and after the project period.

By making financial education a mandatory requirement to receive housing assistance from this grant, we will help families—particularly low-income ones—understand their options and how their choices can affect their monthly budget. The financial education we will provide during LM-HIP will also give benefiting families the knowledge to understand the lending process toward homeownership, so that they will not be intimidated by lenders; this knowledge will also empower them, which will assist in reducing the level of distrust. As another result of financial education, families may learn to recognize the negative claims on their credit reports and be given the knowledge base to repair their credit, again in preparation for homeownership.

In essence, LM-HIP will assist households with immediate needs for repair, rehabilitation, weatherization, mitigation and even—in the most drastic circumstances—replacement of dilapidated homes that have been judged to be unlivable. Additionally, LM-HIP will provide those and other beneficiaries with the financial education to learn how to lift themselves out of

⁶² <https://www.census.gov/programs-surveys/acs>.

⁶³ <https://www.usda.gov/media/press-releases/2024/01/08/usda-reminds-producers-upcoming-discrimination-financial-assistance>.

generational poverty and into an empowered state of mind in which they can see themselves—maybe not immediately, but certainly in several years—potentially making the largest financial investment of their lives by taking concrete steps toward owning both their own homes and the land their homes sit on.

Exhibit D: Soundness of Approach

Project Description, Management, and Impact

Vision and Project Goals

The vision of the LLD is to provide affordable, safe, and sanitary housing options for eligible LMI Lumbee Indian families in the project area of Cumberland, Hoke, Robeson, and Scotland counties of North Carolina.

Our goals for the proposed project are to rehabilitate, repair, replace, mitigate, and weatherize homes of LMI Lumbee families who own and live in manufactured homes by providing the following services:

- Indirect services, including consultations, assessments, education, and advising
- Home rehabilitation (200 homes at \$25,000 each)
 - Rehabilitation of homes through repairs to floors, roofs, HVACs, and bathrooms
 - Abating and mitigating mold, lead, and other health hazards (including pests such as termites and fire ants) in homes with moisture problems and leaks
- Home weatherization (150 homes at \$10,000 each)
 - Weatherizing homes by replacing old windows, doors, and HVAC units
 - Increasing R-values by increasing insulation in walls, floors, and roofs of homes to cope with extreme heat and cold from climate change
 - Regularizing inspections and replacement/repair of anchors and tie-downs of homes for increased safety during high winds, hurricanes, and tornadoes
- Home mitigation (35 homes at \$15,000 each)
 - Elevating homes above the floodplain
 - Elevating HVAC units for continued safe use during extreme weather conditions
- Home replacement (20 homes at \$75,000 each)
 - Replacing dilapidated mobile homes
- Home relocation credit and MHC lot rent vouchers to prevent evictions of “homesite renters” (50 homes at \$20,000 each)
 - Relocating homes as necessary out of trailer parks or floodplains with land acquisition assistance and/or home transport and setup costs
- Home ownership assistance (25 members at \$20,000 per applicant)
 - Providing down payment assistance for renters to become homeowners

Activities to Address the Stated Needs

The LLD will base its proposed activities for the proposed LM-HIP on its nearly three decades of experience with receiving and administering IHBG and NAHASDA funding for housing projects. In essence, these proposed activities will be a focused extension of and supplement to what we already do with IHBG funding in our project area.

- Home rehabilitation – By rehabilitating homes via targeted repairs to floors, roofs, HVAC, and bathrooms, we will improve the safety and sanitary living standards of low-

to-moderate income tribal members whose incomes fall below 80% of the median income level. The program will contract necessary repairs to eligible tribal members' homes to improve the quality of substandard units.

Also, humid conditions during and after extreme weather events such as hurricanes are known breeding grounds for mold. Wooden trusses and ramps, steps, and porches are also inviting to such pests as termites.

If home inspections reveal the presence of these or other pests (e.g., fire ants) or health hazards (e.g., the presence of lead in the home's materials), the LLD will bring in pest control or mold abatement contractors (or similar specialists) to address these issues.

During the proposed project, we anticipate providing home rehabilitation services to 200 households at approximately \$25,000 each.

- Home weatherization – Among the places where homes lose the most heat or air conditioning, depending on the season, are windows, doors, and the surrounds of HVAC units.

Contractors will focus on routine and non-routine repairs on all homes and replacement of their fixtures as needed. We will contract the replacement of windows, doors, and HVAC unit surrounds/side panels with new items made of weather resistant and climate appropriate materials that are also environmentally friendly. The result will be homes with fewer energy leaks, which will make them both more comfortable and more economical to heat and cool.

Second, we will contract the installation of rigid and/or blown-in insulation in walls, floors, and roofs of existing manufactured homes to increase R-values. These insulating materials will be environmentally friendly, weather resistant, and climate appropriate as well as non-toxic to the people living there (i.e., no outgassing of harmful chemicals).

The result will be cooler homes in summer and warmer homes in winter, which will save energy while also making the homes more comfortable for household members and more hardened against climate extremes.

Finally, home inspection schedules will be regularized for convenience and compliance with national and state standards.

Anchors and tie-downs will be repaired or replaced as necessary to provide greater safety during extreme weather conditions (e.g., severe storms, tornadoes, and hurricanes) and natural disasters (e.g., the flooding that often results from coastal hurricane strikes).

During the proposed project, we anticipate providing home weatherization services to 150 households at approximately \$10,000 each.

- Home mitigation – Following processes and procedures that we have developed into SOPs, we will use FEMA data, recently updated information from the North Carolina Flood Risk Information System (NC FRIS), and other sources to determine the level of flood risk for homes in floodplains. We will then elevate at-risk homes for eligible tribal members to a minimum of 24 inches above flood levels. We will also ensure that new and repaired HVAC units in these and other homes are elevated above flood levels for safe use even during extreme weather and natural disasters. After elevating the homes and the HVAC units to the needed level for added resilience both during and after floods and extreme weather such as hurricanes, we will strengthen tiedowns or foundations for safety and security.

Any issues with access by physically disabled or infirm household members will be addressed by building ramps, widening doorways, and making bathrooms more handicapped-accessible per ADA requirements (i.e., lowering fixtures or installing ADA-compliant fixtures, installing shower and bathtub grab bars, etc.). Rehabilitation of units will increase ADA compliance in a timely manner; down payment assistance will help with the cost burden of upfitting units to be compliant. All elevation and construction of trusses, ramps, undergirding members, etc., will comply with federal, state, and local zoning laws and construction-related regulations.

During the proposed project, we anticipate providing home mitigation services to 35 households at approximately \$15,000 each.

- Home replacement – Given the realities of the extent of poverty in the four-county project area and the recent hurricanes that have stressed the housing stock considerably, we expect that approximately 20 of the manufactured homes we inspect during this program will be too dilapidated to repair cost-effectively.

We will replace those homes at a cost of approximately \$75,000 each, which will cover purchasing the new home, moving it to an appropriate location (which may or may not be the same location the original home occupied), and setting up its utilities.

- Home relocation credit and MHC lot rent vouchers to prevent evictions – After determining that home relocation would be best for financial or safety reasons, the LLD will assist owners of manufactured homes in acquiring land through loan assistance (e.g., forgivable loans covering most of the cost of relocation) and financial education that prepares owners for land ownership.

Owners will also be assisted in planning the logistics of home relocation from trailer parks or floodplains to owned parcels of land far away from predatory trailer park owners or dangerously high flood levels that occur during or after extreme weather or natural disasters.

During the proposed project, we anticipate providing home relocation services to 50 households at approximately \$20,000 each.

- Home ownership assistance – To assist renters in becoming homeowners, we will provide 25 households with \$20,000 toward their down payments. Eligibility requirements for down payment assistance include: verification of income and being below 100% of the NMI, pre-approval for financing on a new manufactured home, a record of five-year consecutive renting of a manufactured home in an MHC or from a private landlord, and the mortgage payment must not exceed 30% of their adjusted gross income.
- Providing financial education toward purchasing new (or new-to-clients) homes – We will provide financial education programming (workshops, consultations, advice, etc.) to LTNC household members that will help them prepare for homeownership. Topics will include understanding home financing principles, budgeting toward a down payment, the costs and fees associated with purchasing a home, maintaining sufficient savings for home maintenance and repairs, and refinancing opportunities to seize when interest rates drop, home values rise, or refinancing becomes attractive for other reasons.

Timeline and Key Tasks

Our project timeline will include key tasks such as the following:

- Advertising the program – We will advertise the program at tribal and district/community meetings and through tribal communication channels (monthly newsletters, social media, and other outreach and engagement pathways such as local/regional radio and TV stations).

We will conduct surveys and focus groups to gain input, feedback, and participation. Using these existing communication channels, the LLD will provide information about the proposed project, invite comments, and build interest and engagement by asking eligible members to join the project waiting list or seek other housing-related services.

- Accepting and reviewing applications – The LTNC Housing Department staff, who are accustomed to receiving and reviewing applications, will handle this task.

Following a complex decision tree mirroring our existing home rehabilitation SOP, our staff will determine the level of need for each household and respond on a first-come, first-served basis.

- Hiring and training key contractors and subcontractors – Once the LLD has a clear understanding of the amount and kinds of work needed to repair, rehabilitate, or elevate specific homes, we will hire key contractors and subcontractors.

We will provide them with training to ensure that they follow appropriate federal, state, municipal, local, and Lumbee Tribe laws, regulations, and policies while performing their assigned tasks.

- Writing the program SOPs and associated policies (by adapting our existing SOP) – The program SOPs and associated policies will largely mimic our existing home rehabilitation SOP, which is described below.

Currently, we request applications from potential clients that contain required documentation including a copy of the applicant's tribal enrollment card, copies of picture IDs for all household members over 18 years old, copies of Social Security cards for all household members, copies of birth certificates for all household members over 16 years old, proof of income for all household members, proof of assets, and copies of deeds to the property, Filed Lifetime Rights, and/or the household's mobile home title or bill of sale.

If handicap accessibility is needed, we require a letter from the client's or beneficiary's doctor to be included in the application.

Also, the LTNC performs a criminal background check for all household members over 16 years old. We perform this check because, per current tribal policy, the LTNC does not provide services to people who have had a felony conviction in the last seven years.

To determine eligibility, our Housing Department staff members check that adjusted income is within the 80% national income limits and that the client has ownership or rights to the home.

We then input the client's information into our Client Care database and send a Needs Assessment request to the tribe's Rehabilitation Inspectors. An Inspector will respond to the request by completing an inspection of the home regarding the requested repairs; the Inspector will determine whether the home requires non-emergency repairs or mobile home replacement. Upon the return of the Needs Assessment, the client is placed on our waiting list.

We comply with federal, state, and local regulations and tribal and Housing Department policies and procedures by collecting required documentation, including a) bank statements for each person living in the home or a No Bank Statement affidavit, b) income information for each person living in the home or a No Income affidavit, c) a copy of the vehicle registration or title for each person living in the home or a No Vehicle affidavit, and d) any relevant property tax documentation.

We also check that tribal enrollment cards are active and that criminal records of all household members over the age of 16 are known. We also ensure that clients' files include all deeds to property, Filed Lifetime Rights, and/or mobile home titles or bills of sale. We check property tax records, annotating the client's file as we do so.

We perform a flood zone search; if the home is in a flood zone, we encourage purchasing flood insurance as part of the financial education activity. We make sure relevant maps are in the client's file as well. We determine whether the home needs to be tested for lead,

termites, or other pests or hazards; if testing for lead is required, the Rehabilitation Secretary is notified and contractors perform the task.

After a thorough investigation, the Rehabilitation Coordinator visits the home for a final inspection before the bidding process. Housing Department staff members write up the results of the entire process thus far as a proposal for repairs that is then given to Cost Analysis.

The bidding process is initiated when the client’s folder is received from the Rehabilitation Coordinator, an event noted in the Client Care database. The client is contacted to set an appointment to come to the LTNC tribal complex along with a successor of their choice to complete a workshop packet and choose contractors for their requested home repairs.

- Administering services – The bulk of the project period will be spent administering services, including elevating eligible manufactured homes; replacing and elevating HVAC units as needed; increasing insulation in walls, floors, and roofs and weatherizing homes by replacing old windows, doors, and HVAC units; regularizing inspections and replacement/repair of anchors and tie-downs of manufactured units; relocating homes, as necessary, with land acquisition assistance; replacing dilapidated homes; abating and mitigating mold and other pests and health hazards; providing down payment assistance; and providing financial education toward clients’ purchases of new (or new-to-them) homes.

Surrounding these services will be ancillary services such as consultations, assessments, and so forth. For example, each application for assistance will have to be reviewed for eligibility and compliance. Once determined eligible, each home will have to be inspected and evaluated. The evaluation will define the scope of work needed to mitigate/weatherize/repair/relocate the home. Once a home is determined eligible and the scope of work defined, services will have to be contracted, invoices will have to be paid, and records will have to be made and filed for reporting.

- Collecting data regarding services and beneficiaries – Finally, during and after the project we will gather appropriate data regarding the project services we will provide and use those data to assess the short-, medium-, and long-term impacts on the beneficiaries.

The below table shows a high-level project timeline for the above tasks:

		Advertising the Program & Application & Selection Process	Home Rehabs	Home Weatherizations	Home Mitigations	Home Replacements	Home Ownership Assistance	Financial Education	Data Collection	Assessment of Impact(s)
Y1	Q1	X	X	X	X	X	X	X		
	Q2	X	X	X	X	X	X	X	X	
	Q3	X	X	X	X	X	X	X		
	Q4	X	X	X	X	X	X	X	X	X
Y2	Q1	X	X	X	X	X	X	X		
	Q2	X	X	X	X	X	X	X	X	

	Q3	X	X	X	X	X	X	X		
	Q4	X	X	X	X	X	X	X	X	X
Y3	Q1	X	X	X	X	X	X	X		
	Q2	X	X	X	X	X	X	X	X	
	Q3	X	X	X	X	X	X	X		
	Q4	X	X	X	X	X	X	X	X	X
Y4	Q1	X	X	X	X	X	X	X		
	Q2	X	X	X	X	X	X	X	X	
	Q3	X	X	X	X	X	X	X		
	Q4	X	X	X	X	X	X	X	X	X
Y5	Q1	X	X	X	X	X	X	X		
	Q2	X	X	X	X	X	X	X	X	
	Q3	X	X	X	X	X	X	X		
	Q4	X	X	X	X	X	X	X	X	X
Y6	Q1	X	X	X	X	X	X	X		
	Q2	X	X	X	X	X	X	X	X	
	Q3	X	X	X	X	X	X	X		
	Q4	X	X	X	X	X	X	X	X	X

As can be seen from the above chart, advertising the program, taking applications, and selecting program participants will be a year-round process; the services will also take place in every project quarter; the data collection will occur twice a year (in Q2 and Q4); and the assessment of the project impact(s) will occur once per year (at the end of each project year, in time for the annual reports to HUD).

Budget

Our below budget for the proposed project shows the funding we are requesting from PRICE.

Line Item:	Planned amount to serve:	Budget amount:
Indirect services: to include a financial educator	Salaries, benefits, rent, supplies	\$1,000,000
Home Rehabilitation	Home repairs such as floors, roofs, HVAC, and bathrooms (200 households at \$25,000 each)	\$5,000,000
Home Weatherization	Window and door replacement, insulation upgrades, and HVAC upgrades (150 households at \$10,000 each)	\$1,500,000
Home Mitigation	Elevate homes and HVAC units in floodplain (35 homes at ~\$15,000 each)	\$500,000
Home Replacement	Replacement of dilapidated mobile homes (20 homes at \$75,000 each)	\$1,500,000
Home relocation credit & MHC lot rent vouchers to prevent evictions	Relocating out of floodplain or trailer park (MHC) (50 at \$20,000 each)	\$1,000,000

Home Ownership Assistance	Providing down payment assistance (25 members at \$20,000 each)	\$500,000
Total:		\$11,000,000

Anticipated Impacts of Project Activities

The final outcomes of the proposed project will include 405 LTNC households benefiting from these activities, as well as 200 homes repaired/rehabilitated, 235 homes moved out of floodplains or otherwise strengthened against the effects of climate change via weatherization procedures and related activities, 20 new homes provided by this project, and 25 homes purchased with down payment assistance through the project. The useful lives of these new and repaired homes will be 30+ years; access to and affordability of this housing, after repair or replacement, along with access to and affordability of the process by which tribal members can request housing assistance, repair, or replacement, as provided by the LTNC’s Housing Department, will be ensured for 30+ years as well.

Affordability and Equity

Via the financial education component of our proposed project, LMI families benefiting from LM-HIP project services will learn to create and understand their monthly budget. They will gain insights into their debt-to-income ratio and how that should affect their spending as well as saving. These families will also gain a perspective of the financing options available to them to help fund maintenance and repair for years to come. If their homes are in a flood zone, we will recommend that they purchase flood insurance and explain how to afford it. They will be introduced to financing in the private market as well as the public market through programs like the USDA 504 direct loan/grant programs. (These informative sessions will also be made available to interested tribal members who are not receiving other LM-HIP services.)

We will help clients offset the cost of repairs to their homes with a five-year forgivable loan up to \$25,000 as shown in the home rehabilitation line item in the project budget. Also, we will offset the cost to protect homes from future climate change events by absorbing the cost to elevate homes and HVAC systems with 5-year forgivable loans of \$15,000 as shown in the home mitigation line item in the project budget.

The LTNC Housing Department will follow its standard practice of taking applications, conducting compliance reviews for eligibility, and initiating construction contracts, routine inspections, and closeout of each project and contract.

Home weatherization will follow the same procedure with a focus on improving the thermal rating of each home at a maximum benefit of \$10,000 per home.

Protections to be Put in Place for Residents (Renters)

Although the focus of LM-HIP will be on those tribal members who own their homes, the proposed project will address renters in the context of the affordability of lot rents for mobile

homes. Those tribal members who have undergone the LM-HIP application process and who have been selected for assistance during this project will have the opportunity to receive home relocation assistance, land acquisition assistance, and/or MHC lot rent vouchers to prevent evictions of “homesite renters” and to help LM-HIP beneficiaries toward homeownership not only of mobile homes but also the land they sit on.

Also, as part of the LM-HIP project activities, we will offer down payment assistance for MH renters so that they can become homeowners; we will also offer housing counseling and relocation assistance. We will also work with community organizations, local municipalities, and local legal aid services to educate tenants on tenants’ rights and to provide guidance and advice in situations in which tenants’ rights need protection.

Access to Resources and Financing

It is the policy of the Lumbee Tribe of North Carolina to develop and operate projects with Indian preference, as provided in NAHASDA section 101 K. To the greatest extent feasible, preference shall be given to Indians, Indian organizations, and Indian-owned economic enterprises in the award of all contracts, subcontracts, and employment.

The LTNC shall make good-faith efforts to ensure that small, minority and women-owned businesses, labor surplus area firms and low-income individuals are used, when possible, as required by federal law. Such efforts shall include, but shall not be limited to:

1. Including such firms, when qualified, on solicitation mailing lists;
2. Encouraging their participation through direct solicitation of bids or proposals whenever there are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such firms;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by such firms;
5. Using the services and assistance of the Small Business Administration;
6. Including in contracts a clause requiring contractors, to the greatest extent feasible, to provide opportunities for training and employment for lower income residents of the project area and to award subcontractors for work in connection with the project to business concerns which are located in, or owned in substantial part, by persons residing in the area of the project, as described in federal regulations;
7. Requiring prime contractors, when subcontracting is anticipated, to take the steps listed in 1 through 6 above; and
8. In accordance with section 3 of the Housing and Urban Development Act of 1968, the LTNC shall, to the greatest extent feasible, afford preference in contracting, training, and employment to lower income area residents. These provisions apply to Section 3 covered projects or activities for which the amount of assistance exceeds \$200,000.

Environment and Resilience

Significant Hazards That Could Impact Project Sites

Along with climate change has come heat and other extreme weather such as severe storms, including tornadoes and hurricanes. The four-county project area is particularly vulnerable to the latter, given the low-lying land in the area and its proximity to the North Carolina coast, already noted as being especially high-risk for hurricane strikes in the future. Devastating flooding resulting from hurricanes is a well-known hazard as well.

The planned home elevation activities (to a minimum of 24 inches above the flood plain, which is a zoning requirement and which requires a flood plain certificate for each site that is completed by a licensed engineer)—along with the elevation of HVACs as well to prevent flooding loss, combined with the strengthening of walls, floors, roofs, and tie-downs—will reinforce vulnerable homes against these and other significant hazards to increase their disaster resilience.

Addressing Current and Future Threats of Natural Hazards, Extreme Weather, and Disaster Events

We will elevate homes and HVAC units a minimum of 24 inches above the floodplain; for each home and/or HVAC unit that we elevate, we will also keep a record of the accompanying flood plain certificate completed by a licensed engineer. We will also weatherize homes by replacing windows and doors that may be losing air and increasing insulation values in floors, walls, and roofs, thereby improving the homes' thermal value. Additionally, we will repair or replace anchors or tie-downs for increased safety in extreme weather conditions.

This combination of activities will reduce and mitigate impacts to LMI households' manufactured housing from hazards related to extreme weather and natural disasters.

Supporting Vulnerable LMI Households (and Addressing and Mitigating Future Losses)

The four-county project area was affected by hurricanes in 2016 and 2018, causing some repetitive housing losses. In 2019, floodplain mapping showed residents and local government officials where flooding after hurricanes would likely occur; that mapping has been updated by FEMA and by NC FRIS so that vulnerability to floods is now better known.

As one result, residents and local government officials now know which homes need flood insurance. Unfortunately, its cost is a barrier to homeownership in the four-county project area: Some homeowners have even seen their requests for after-disaster FEMA funding denied because their flood insurance was not kept up to date.

The proposed project will address these issues by determining which homes will need to be elevated a minimum of 24 inches above floodplains or moved for increased safety and security and either elevating or moving them as necessary. Also, financial education will include being introduced to the need for flood insurance and strategies for preparing to afford it.

Using and Promoting Weather Resistant and Climate Appropriate Materials Across Project Sites

The LLD is well aware of building codes, zoning regulations, and other laws, regulations, and best practices regarding affordable housing—especially manufactured housing. Given the long-term environmental and climate concerns related to the four-county project area, the LLD will, in carrying out the proposed project, adhere to current mobile home efficiency standards⁶⁴ while using and promoting weather resistant and climate appropriate materials across all project sites.

Advancing Environmental Justice

The LLD will advance Environmental Justice as defined by HUD in the PRICE NOFO by elevating homes and HVAC units. In that way, we will protect tribe members' health and safety both during and after extreme weather (e.g., severe storms, tornadoes, and hurricanes) and natural disasters (e.g., the flooding that follows hurricanes).

We will also abate and mitigate mold and other health hazards such as lead and pests such as termites and fire ants.

Additionally, our home rehabilitation services will make homes more comfortable and energy-efficient, so that the households served will have better lives.

Community Engagement

Seeking and Encouraging Diverse Stakeholder Participation

The LTNC is a respected member of the community. Our nearly three decades of experience in providing and rehabilitating affordable housing have resulted in high levels of trust as well. We are accustomed to obtaining input from surrounding and involved stakeholders—local government officials, nonprofit agencies providing complementary needed services, manufactured housing companies and associated services that move and set up homes, and builders and housing contractors—and using that input to refine and focus services toward addressing targeted needs and populations. We will continue to seek input and feedback from all stakeholders during the proposed project as well.

Specifically, as required by the NOFO, we will announce—during a 15-day period—that we will put this proposal out for public review via our website and other venues and communication channels, collect comments during the 15-day public review period, and document those comments (and commenters) in Attachment H.

Additionally, the LTNC conducts monthly tribal council meetings of the 21 tribal council members who each represent the tribal members in one of the 21 tribal districts within the four-county tribal territory. (Each district has an elected tribal council member that represents the tribal members of that area.) These meetings also have a period for public comment. During the proposed project, we will continue to use these public comments as sources of considerations for improving our services to our members, as we have done since the Housing Department was initiated. For their input, we will share the plan with local municipalities and municipal officials

⁶⁴ <https://www.energy.gov/articles/doe-updates-mobile-home-efficiency-standards-lower-household-energy-bills>

such as county commissioners in the four counties as well as community organizations like local planning boards.

The LTNC Housing Department also presents housing services and upcoming programs at community meetings held in each district periodically on a semi-annual cycle. We will also distribute news items in our monthly newsletters and conduct surveys and focus groups to gain participation. Additionally, the tribal housing department will engage target populations through regular outreach and engagement communications venues that include social media. The LTNC will leverage these existing communication channels to provide information about the proposed project, obtain tribal members' input and feedback, and build interest and engagement by inviting eligible members to join waiting lists and indicate their need for housing services in other ways.

Aligning With Existing Community Plans and Policies

The LTNC has a strong commitment to improving our members' lives by providing affordable, safe, and sanitary housing options for them. We have done this for nearly three decades; this continues to be such a strong commitment that our housing-related activities represent the majority of the work that we do.

As such, the proposed project and all other housing-related activities per our Lumbee Tribe Housing Plan reflect comprehensive, thoughtful, carefully considered planning and policymaking by our Tribal leadership team. The proposed LM-HIP project complements both the Chairman's long-term goals and the tribe's Indian Housing Plan (IHP), which ensures safe sanitary housing, breaking generational poverty cycles, encouraging generational wealth through homeownership, and increasing financial education and literacy to help break the cycle of poverty, all of which are current goals of the LTNC. The LM-HIP project will allow LTNC to provide wraparound housing services to our neediest members.

Exhibit E: Capacity

The LTNC, through its nonprofit organization LLD, proposes a new housing construction project in response to the HUD PRICE funding opportunity. The LTNC employs a managerial and technical staff team who will plan, manage, and implement the proposed project: LM-HIP.

The LTNC has considerable capacity to perform this project. The development of this proposed project—from planning to administrative considerations to implantation, including construction and renovation—has been carefully planned and budgeted, including project management, direct supervision, and general contract work.

The LTNC has complete confidence that its staff members are prepared to execute the plans outlined in this proposal in an efficient, timely, and cost-effective manner that will meet and likely surpass HUD's expectations and requirements.

Experience Managing Projects

In the past three fiscal years, the LTNC has constructed 27 new homes (via our homeownership program), completed 748 emergency home repairs, and constructed 38 rental units. In that same time, we have operated and maintained 206 rental units and administered on average 20 rental vouchers for homeless tribal veterans annually.

The LTNC has no gaps in capacity in regarding this project. Each level of development from the administrative to construction and planning has been carefully accounted for including project management, direct supervision, and general contract work.

Experience Using Grant Funds

The project will follow all tribal processes, which adhere to both federal and state requirements. Our tribal staff—including our Finance Director, Director of Governmental Affairs, and Legal and Compliance Officer—are well-versed and -trained in procurement and contracting procedures, including those that align with 2 CFR Part 200. The LLD will act as the developer and utilize its established sealed bid procurement process for construction services.

In the past fiscal year, the LTNC managed grants totaling over \$50 million. During the COVID-19 pandemic, as grant funding surged, the LTNC managed over \$80 million annually, including grant programs such as Mortgage Pandemic Relief. For more than two decades, the LTNC has managed NAHASDA (Native American Housing and Self-Determination) grant funding, with multiple clean audits. Internal controls include our established finance staff and policies. Our grant management is carried out with in-house staff, and most grant administration relates to housing.

In addition, the LTNC conducts annual internal monitoring with policy and procedures approved by HUD. Annual programmatic audits are also conducted by funding sources. Finally, the LTNC conducts single annual audits in accordance with 2 CFR part 200, subpart F. These mandatory, third-party audits are filed with the Federal Audit Clearinghouse.

The LTNC's Procurement and Project Management Policies and Their Compliance with Federal Grants Management Regulations (the Uniform Guidance)

The LTNC follows two ruling documents in matters of procurement and contract management: the LTNC Procurement Policy and the LTNC Financial Management Policy, updated May 11, 2021, and June 7, 2011, respectively. In accordance with 2 CFR 200.318, the LTNC Procurement and Financial Management Policies are published and adhered to by all staff to ensure compliance with applicable regulatory requirements at 2 CFR part 200 and 24 CFR part 1000, including state, local, and tribal laws and regulations.

Section VII-C of the LTNC Procurement Policy states that the LTNC “will maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts and purchase orders” as required by 2 CFR 200.318(b). Section XI-A includes ethics and conflict of interest guidelines that conform to 2 CFR 200.318(c): “No employee, officer or agent of LTNC shall participate directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved.” Section XI-C adds that “LTNC officers, employees, or agents shall never solicit anything of monetary value from contractors, potential contractors, or parties to subcontractors,” which is also in accordance with 24 CFR 1000.30.

Section VIII-A states that to prevent “unnecessary or duplicative items, consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase For equipment purchases, a lease versus purchase analysis should be performed to determine the most economical form of procurement,” thereby meeting the requirements of 2 CFR 200.318(d). Furthermore, Section III-H of the LTNC Procurement Policy refers to “intergovernmental agreements to purchase or use common goods and services” and states that “LTNC will try to use federal or state excess and surplus property instead of purchasing new equipment and property” as encouraged by 2 CFR 200.318(e) and (f), respectively.

Per the LTNC Procurement Policy, “Procurements shall be conducted only with responsible contractors, i.e., those who have the technical and financial competence to perform and those who have the satisfactory record of integrity,” thereby fulfilling 2 CFR 200.318(h): “Consideration will be given to such matters as contractor integrity, compliance with public policy, a record of past performance, and financial and technical resources.” The policy provides instruction and guidance to ensure that the LTNC maintains records sufficient to detail the history of procurement as required by 2 CFR 200.318(i) including the “rationale for the method of selection” as supported in Section III-A(1) of the procurement policy: “All procurement files shall include a rationale in the supporting documentation as to the method of procurement used.”

Time and materials contracts are addressed in Section VII-A as required by 2 CFR 200.318(j), providing guidance that assists the Tribe in settling all contractual administrative issues arising out of procurement that a ceiling price must be established in a “time and materials” -type contract.

Additionally, the LTNC employs knowledgeable, competent, and experienced administrative and management staff who possess the ability to resolve issues related to the implementation of the

proposed project, “in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements,” thereby complying with 2 CFR 200.318(k).

In accordance with 2 CFR 200.319, Section VIII of the Tribe’s Procurement Policy prohibits unduly and unnecessary restrictions that would hinder full and open competition. Section III of the LTNC Procurement Policy, which aligns with 2 CFR 200.320, outlines the allowable purchasing methods to be used for procurement with the exception of the dollar value thresholds. The LTNC elected to set lower limits for micro-purchase thresholds at \$10,000 and small purchases (simplified acquisitions) at \$250,000. Section X of the Procurement Policy requires the LTNC to make “good faith efforts to ensure that small, minority and women-owned businesses, labor surplus area firms and low-income individuals are used, when possible” as required by 2 CFR 200.321.

The LTNC adopted its General Specifications for Emergency and Rehabilitation and New Construction General Specifications policies, which dictate the use of specific types and grades of materials to be used, to be compliant with 2 CFR 200.322. The Tribe holds employees, contractors, and subcontractors to these standards.)

To comply with 2 CFR 200.323, the LTNC Procurement Policy requires a cost or other price analysis to be performed for all procurement actions in Section II.E., in accordance with 2 CFR 200.323(a), and limits the use of non-competitive procurement. However, if used, Section III-G. requires “written justification for using such procedures. The justification shall be approved in writing by the Tribal Administration or his/her designee.” Noncompetitive procurements should also undergo a cost analysis, thus meeting the requirements in 2 CFR 200.323(b).

The Procurement Policy also states in Section I that procurement efforts must be made “efficiently, effectively, and at the most effective prices.” The LTNC Financial Management policy further states that “the procedures governing the financial management of the LTNC shall comply with the provisions at 2 CFR 200.302.” These two efforts combined comply with 2 CFR 200.323(c).

The LTNC Procurement Policy prohibits the use of cost plus a percentage of cost contracts at Section VII-A in accordance with 2 CFR 200.323(d). It is the LTNC’s practice to make any and all records available to HUD, and all other funding agencies, upon request as required by 2 CFR 300.324. Prior to the award of any contract, Section VI-D.1. requires LTNC to obtain a bid guarantee in the form of a bid bond, certified check, or letter of irrevocable credit equivalent to 5% of the bid price. Before starting the scope of work, the contractor must provide a performance and payment bond for 100% of the total contract where the contract is \$100,000 or more, as required by 2 CFR 200.325. Section VII.B. of the LTNC Procurement Policy lists all the applicable clauses from 2 CFR 200.326 required to be in all contracts awarded by the Tribe.

Section V-A. of this policy states that “it is the policy of the LTNC to develop and operate projects with Tribal preference, as provided in NAHASDA section 101 K” as stated in 24 CFR 1000.50; “This includes feasible preference being given to Lumbee-owned economic enterprises in the award of all contracts and subcontracts.” Pursuant to 1000.54, the LTNC Procurement

Policy Section V-3a. states that contracts and solicitations may include a statement of the method of Indian preference and applicable, locally imposed preference requirements.

Section IX-D notes that “complaints arising out of any of the methods of providing for Indian preference shall be handled in accordance with the procedures specifically set out in the federal regulations (24 CFR part 1000.54) that require written complaints to be filed within 20 calendar days of the action (or omission), and a final determination by the LTNC must be provided within 30 calendar days of submittal.”

Key Project Staff

The proposed project’s key staff are experienced, knowledgeable, and well equipped to carry out the planning and implementation activities outlined in this proposal.

Tammy Maynor, the LTNC’s Director of Governmental Affairs, has served in senior-level positions with the tribe since 2002. Maynor oversees the operation of all grant funding, including federal IHP and ARP funding. She was instrumental in securing and administering a \$6 million Title VI loan for the LTNC in 2020 for Dreamcatcher Housing Projects, which includes a total of fifty (50) rental units in tribal communities across our territory.

In the proposed project, she will provide administrative support by ensuring project compliance in accordance with all required rules and regulations. Maynor will act as a liaison, both interdepartmentally and with the LTNC Tribal Council, to create effective flows of communication and provide oversight on construction activities and budgets.

Ricky Harris, Tribal Administrator, entered this position in June 2022. In this capacity, Harris oversees all activities within the tribal organization, including housing projects and management of over 160 employees. Previously, Harris served as County Manager for Robeson County, which along with Cumberland, Hoke, and Scotland counties make up the LTNC’s four-county project area. In this position from 2012 to 2019, Harris managed an operating budget of \$150 million while administering the construction of multimillion-dollar projects. In this capacity, Harris also oversaw the Robeson County Housing Authority, which provides housing opportunities for many low to moderate-income families in our tribal communities.

In the proposed project, he will provide administrative/technical support by acting as the day-to-day extension of the Tribal Chairman and Tribal Council, monitoring budgets, troubleshooting, and helping to facilitate project advancement.

As Tribal Administrator, Harris is ultimately responsible for the overall success of the project.

Sharon Bell, Finance Director, has served in this role for 19 years. Bell has provided the financial services associated with all new construction programs. In the last five years, Bell has provided financial oversight, including procurement and budgeting, on various housing activities, including new construction projects for new tribal housings units and community buildings.

In the proposed project, she will provide administrative oversight on all procurement, financials, budgeting, audits, and accounts payable for the LM-HIP project.

Anthony Pevia, Director of Housing Development, has been employed with the LTNC in the Housing Department since 2013. In 2018, he became the Housing Rehabilitation Manager, in which position he administered HUD programming and performed annual program audits, while managing a budget of over \$3 million and supervising 11 employees. In 2021, he began his current role as Director of Housing Development; in this role, he has overseen the development of LTNC Warriors Way Village, a HUD-funded project that has provided 10 housing units for homeless Lumbee veterans. Pevia has also played an integral role in facilitating the construction of 15 rental units in a Tribal community that were completed in Summer 2022.

In the proposed project, he will provide managerial oversight of the project by creating construction schedules, timelines, and deliverables and ensuring that those are all met. He is also tasked with budget and staff management from the beginning to the end of this project.

Bradley Locklear, Director of Housing Services, has served in this role since September 2021. He directs a staff committed to compliance as well as customer satisfaction and works directly in the administration of our IHBG-related programs. The programs administered through housing services vary in range from transitional housing to homelessness prevention, financial education, and permanent housing programs. Prior to this role, Locklear served as the General Housing Director for the LTNC since 2018, where he administered NAHASDA programming. During that time, he initiated and planned the eligible activities for the Indian Housing Plan, as well as directed staff to execute, control, monitor, and report on the progress of these housing activities. These activities included (1) new housing construction both for single-family home (SFH) rental programs and for homeownership programs, (2) housing rehabilitation, and (3) the management of 181 rental units and over 450 mortgage accounts. Under his direction, the Housing Department also completed the infrastructure for several major housing projects.

In the proposed project, he will provide technical assistance, working alongside the Home Rehabilitation Manager, the New Construction Manager, the Rental Program Manager, the Assets Manager, and the Financial Educator to monitor the compliance and success of each component of the proposed project. Along with his staff, Locklear will also facilitate program planning and development related to housing services for the proposed project, including project beneficiary selection and placement.

Grace Oxendine, Home Rehabilitation Manager, has served in several roles within the Housing Department over the last 15 years. She began her career with the LTNC in 2009 as the Housing Specialist of Hawkeye Sands Apartments where she managed 62 units for a span of five years. In 2014, Grace became the Procurement Specialist for our organization. Grace was solely responsible for locating key suppliers, negotiating the company's purchasing agreements and ensuring that their materials and products met the organization's specifications. In 2016, she began her first leadership role as Manager of 1937 Stock and Elderly Housing. She was responsible for the administration of the day-to-day activities for Tribal Housing sites, grievances, policies, maintenance activities, and operating budgets. Grace supervised site operational staff, maintenance staff, resident initiative programs and activities for each of seven

rental sites. In 2021, she began her current role as the Rehabilitation Manager. In this role, she oversees the implementation of planned housing rehabilitation services and the Home Replacement program.

During the last fiscal year, she executed 217 home rehabilitation contracts via HUD Indian Housing Block Grant funds with an annual program budget of \$3,916,990. She also executed a single procurement contract in the amount of \$2,220,990 for the replacement of 30 manufactured homes that replaced fully dilapidated homes with brand-new 14x70 HUD-compliant homes utilizing American Rescue Plan COVID-19 relief funds.

In this project, she, her staff members, and contractors will replace HVAC units and peripherals; mitigate home hazards; provide handicapped accessibility; and replace or repair doors, windows, roofs, floors, structural members, electrical systems, plumbing, and other necessary services like septic tanks.

Kathy Locklear will serve as the Financial Educator during the proposed project. She has served for 16 years as the Financial Education/Housing Manager with the Lumbee Tribe. In addition to a BS in Business Administration and an MS in Public Administration (MPA), she holds the following certifications: Certified Housing Counselor, Certified Credit Counselor, and Certified Train the Trainer from the Association of Housing Counselors; Empowering Financial Wellness; Proficient in Understanding the Compliance Requirements of the Fair Credit Reporting Act; Alternatives to Foreclosure; Tribal Housing Financial Literacy Program Development Skills; Homebuyer Education; Bankruptcy Basics; NAHASDA Refresher: Basics That Everyone Should Know; Financial Wellness for Tenants: Budgeting and Banking; Title VI Section 184 Basics; Housing Affordability; Debt to Income Ratios; and Beyond the Credit: Conversion to Homeownership.

Drawing upon this considerable knowledge base as the Financial Educator for the proposed LM-HIP project, she will be responsible for working one-on-one and in group settings with potential homebuyers to educate them about financial management in preparation for homeownership. She will review credit reports, explaining how to improve credit scores and noting the savings associated with higher credit scores; help clients understand debt-to-income ratios and housing affordability; help families develop budgets, identify wasteful spending by tracking expenses, prioritize reducing debt, and prepare for emergencies; help clients establish short- and long-term savings goals, including saving for a downpayment, anticipating expenses related to buying a home, and accepting the financial responsibilities related to transitioning from renting to owning a home; review loan products, interest rates, and legal process of buying a home; and, overall, understand the financial and social benefits of homeownership.

Additional Staff to be Hired to Support the Proposed LM-HIP Project

An **Intake Specialist** will be hired to take applications and advise applicants on available services and assistance while coordinating activities with existing community-based programs, agencies and organizations. This person will receive and process applications for eligible applicants for LM-HIP services. Also, this person will perform clerical tasks that include typing, data entry, filing, record maintenance, report preparation, and other assigned clerical duties and

responsibilities to ensure that all tribal members comply with the requirements established by all Rehabilitation, Tribal, and HUD policies and guidelines. This person will perform a criminal record check on each applicant; receive phone calls and inform all members of application process, information, and status; and listen to tribal member questions and concerns while using appropriate problem-solving skills. This position will optimize inter-professional collaborations with the enrollment, energy, and other Tribal departments to ensure appropriate client services and satisfaction. This person will also issue a monthly report of program progress to the Project Manager, coordinate existing internal and external resources for meeting Program services, and generate pledges to utility companies and property owners on behalf of tribal members as needed. This position will participate in orientation, training, and other personal and professional development activities as assigned and perform other associated duties and responsibilities as assigned.

A Rehabilitation Secretary/File Clerk will be hired to be responsible for all clerical and support functions and assigned duties and responsibilities associated with the LM-HIP project. This person will assist the Project Manager on inquiries of application status and will receive approximately 20 phone calls and approximately 5 applicants per day while ensuring office professionalism and quality customer services to tribal members. This person will send response letters of application status to applicants, assist the Project Manager with all database organization, perform all waiting-list data entry and weekly updates, and help the Project Manager expedite services in critical situations. In addition, this person will set up accounts for approved services to local vendors, track and order supplies for the LM-HIP project, file all necessary and pertinent information for the LM-HIP project, and perform typing, data entry, filing, records maintenance, report preparation, and other assigned clerical and support duties and responsibilities to ensure that all tribal members are in compliance with the requirements of the LM-HIP project. This position will also review closed-out applications for auditing purposes to ensure compliance with tribal, HUD, and other governing policies and regulations. This position will respond to inquiries concerning invoices and payables to the contractors and subcontractors and will assist housing staff in organizing and securely maintaining LM-HIP records and reports. This position will assist the Project Manager in maintaining the LM-HIP records of project expenditures; coordinate and schedule LM-HIP professional development training for staff; and assist the Project Manager in scheduling meetings for project updates and staff professional development. This position will participate in orientation, training, and other personal and professional development activities related to their assigned responsibilities and perform other associated duties and responsibilities as assigned.

A Compliance Specialist will be hired to assist project staff and clients in compliance, documentation, and research of eligibility criteria and tribal law. This person will continue the intake follow-up process with applicants for project services by first reviewing the applicant's file for accuracy and completion/inclusion of necessary documents and second contacting the applicant or lender/vendors to inform them of any inaccuracies or any missing and necessary documents. This person will also assist tribal members with referrals to partnering programs for assistance as appropriate/needed. This position will respond in a timely manner to inquiries (written, phone, and email) and perform typing, data entry, filing, records maintenance, report preparation, and other assigned clerical and support duties and responsibilities to ensure that all tribal applicants comply with the requirements established by the LM-HIP project. As such, the

Compliance Specialist will maintain a schedule for client appointments for compliance updates. This position will also update the project database for compliance to assure data accuracy and eligibility for services in accordance with Rehabilitation, Tribal, and HUD guidelines; assist in preparing and conducting rehabilitation workshop packets and secure Deed of Trust Forms for applicants and procurement of contractors from the Qualified Bidder List for applied services per HUD and LTNC regulations, policy and procedures; maintain the Qualified Bidders list by ensuring that all contractors comply with the guidelines established by the Lumbee Tribe Rehabilitation Department and HUD and by maintaining all contractor files and certifications; and serve as a witness in the Bidding Process and Contract Procurement to ensure that all governing policies, procedures, and guidelines have been implemented. This person will assist the Intake Specialist with applications, research external sources (i.e., electronic documents, lenders, tax office, criminal record check, etc.) to verify client eligibility, and process approximately 20 homeowner/vendor/contractors phone calls per day. This person will be responsible for all data entry of workshop completion into housing software, contacting and performing follow-ups with contractors/vendors to ensure timely submission and completion of bid packages, maintaining records of services rendered via an occurrence spreadsheet and all related documentation, and preparing, verifying, and organizing all bid documentation for each weekly bid opening. This person will compile and maintain monthly compliance reports and provide them to the Project Manager; this person will also serve as the next point of contact for the Rehabilitation Secretary/File Clerk. This position will participate in orientation, training, and other personal and professional development activities related to their assigned responsibilities and perform other associated duties and responsibilities as assigned.

Two **Home Inspectors** will be hired to perform inspections of the eligible and selected manufactured housing units during the LM-HIP project to ensure compliance with established electrical, fire, building (both new construction rehabilitation), mechanical, and plumbing codes. Overall, this work will involve interpreting, applying, and enforcing federal, state, and local regulations; the best candidates will possess the ability to estimate cost, labor, time, and materials. These Home Inspectors will apply their considerable knowledge of modern building, plumbing, electrical and mechanical construction practices along with materials and equipment for various stages of construction while receiving approximately 12 calls and performing approximately 4 home assessments and 4 contractor inspections per day. These two individuals will perform thorough assessments of applicants' manufactured homes to detect emergency repair issues, afterward presenting pictures and detailed write-ups to the Project Manager. These two positions will also coordinate working schedules with contractors and homeowners and perform detailed inspections during various stages of the construction process and report their findings to the Project Manager. They will respond to contractors' questions and concerns as issues arise during the construction process; educate homeowners about construction practices and specifications as outlined in the Contractors' Handbook; assist the LM-HIP team in purchasing and gathering housing inventory materials for repair, rehabilitation, weatherization, and mitigation, as appropriate; and, at the end of the rehabilitation/repair process, coordinate a meeting between the homeowner(s) and contractor(s) to review homeowner acceptance documentation and report back to the Project Manager. In addition, these positions will coordinate installation of window AC units and portable heating units to approved applicants. These two positions will report back to the Project Manager all areas of concern with contractors' construction practices; to do this, they will apply their considerable knowledge of the required

methods and practices involved in structural installation, repair, and maintenance of a variety of electrical and mechanical equipment as well as their ability to detect and locate defective workmanship in the construction and/or repair of buildings and mobile homes/manufactured housing. These individuals will have the ability to physically maneuver on scaffolds and structural appendages as well as in cramped places to accomplish thorough inspections. They will also have the ability to exercise tact, courtesy, and firmness with contactors, applicants, project personnel, and the general public. They will have a working knowledge of the service areas of Cumberland, Hoke, Robeson, and Scotland counties along with the ability to establish and maintain effective working relationships with supervisors, associates, representatives from neighborhoods, community leaders and federal, state, and local officials. They will additionally have the ability to use current office equipment (computers, photocopiers, calculators, fax machine, etc.) effectively and efficiently. These positions will participate in orientation, training, and other personal and professional development activities related to their assigned responsibilities and perform other associated duties as assigned.

A **Contract Specialist** will be hired to support—during the proposed LM-HIP project—receiving all invoices and payout documents from contractors, preparing draw requests for completed jobs, and routing required paperwork to the Home Inspectors to help them prepare for and schedule inspections. This person will perform typing, data entry, filing, records maintenance, report preparation, and other assigned clerical and support duties and responsibilities to ensure that all contractors' and subcontractors' invoices and payables are in compliance with federal, state, local, LTNC, and LM-HIP requirements, regulations, policies, and procedures. This position will receive approximately 14 homeowner/contractor phone calls per day and will ensure that all telecommunications and office visits with homeowners and contractors are handled in a professional manner. This position will assist the Project Manager and other LM-HIP personnel in organizing, maintaining, and securing project records and reports; the Contract Specialist will also monitor contractor invoices/payables documentation, prepare draw requests for appropriate payouts to contractors and subcontractors, and route those draw requests to the Finance Department for implementation. In addition, the Contract Specialist will assist the Compliance Specialist during homeowner/contractor/LM-HIP meetings to sign contracts for contractors to begin work. During the project, this position will respond to inquiries concerning invoices and payables to the contractors and subcontractors; this position will close out applications after repairs are completed, file all applications appropriately in electronic and hardcopy data venues (databases and filing cabinets), and assist in reviewing closed-out applications for auditing purposes. This position will participate in orientation, training, and other personal and professional development activities related to their assigned responsibilities and perform other associated duties as assigned.

A **Financial Specialist** will be hired to receive all invoices and payout documents from LM-HIP project contractors and subcontractors, assist in preparing draw requests for completed jobs, and route required paperwork to the Home Inspectors to help them prepare and schedule home inspections. This person will administer contracts—including modifications, correspondence, documentation, certification, and contractual and compliance reporting and maintain contractor and subcontractor logs aligning with established LM-HIP policies and procedures via appropriate software. This person will participate in the negotiation of contract terms from proposal stage to project closeout in accordance with relevant regulations when relevant and appropriate; this

person will also monitor the status of contracts and task orders and ensure the timely collection, monitoring, and/or reporting of deliverables. The Financial Specialist will draft and review teaming agreements, non-disclosure agreements, memoranda of understanding, etc., and maintain logs of all company documents, including Deed of Trust riders. This person will also be responsible for drawing up contracts, purchase orders, and consulting agreements for the Finance Department and for organizing the Contract PO shared folder accessible by LTNC administrative departments. This position serves as a liaison with contractors and subcontractors regarding contracting issues; prepares and maintains records of updated contractor insurance, worker compensation, and general liability; maintains documents and improves current knowledge of relevant contractual procedures and practices; maintains complete and accurate corporate contract files in accordance with all applicable regulations to facilitate internal administration and audits by outside entities; generates reports regarding all LM-HIP contracts as required; and performs contract close-out procedures. In addition, the Financial Specialist will support agency audits as needed, participate in special projects as required, and manage all required contractual agreements with home rehabilitation sites, including distribution, negotiation of budget and language, tracking, and finalization. This position will also maintain the status of contracts in trackers, support the amendment process as needed, and perform other associated duties and responsibilities as assigned.

A **Project Manager** will be hired to coordinate all proposed LM-HIP project activities. This person will manage the project budget and supervise staff hired to implement LM-HIP; simultaneously, this person will assist in assessing and serving housing rehabilitation and development needs of 60,000+ tribal members in the four-county service area (Cumberland, Hoke, Robeson, and Scotland counties in North Carolina) in accordance with the Lumbee Tribal Housing Plan and the proposed LM-HIP project. This position will review client files for accuracy and completion, ensure that program operations comply with Tribal, HUD, NAHASDA, and 2 CFR 200 guidelines, and verify the accuracy and fairness of all procurement in bidding process including technical specification for rehabilitation services. During the LM-HIP project, the Project Manager will conduct necessary meetings with contractors, tribal staff, Tribal Council and HUD personnel as appropriate; supervise on-site inspectors to ensure that all regulations and program requirements are in compliance, building codes are met, and a high level of quality control is maintained in both implementation and documentation; ensure contractor compliance with invoices, payroll submittals, and draw requests; maintain construction records, accurate and detailed filing systems, and reports and records for the Tribal Council and Tribal Administrator to prepare annual HUD required performance reports; and participate in training opportunities to increase knowledge and expertise in HUD housing programs and services. This position will participate in Tribal Council orientation, staff training, and other personal and professional development related to assigned responsibilities and perform other associated duties and responsibilities as assigned.

All “to be hired” staff will be selected based on the minimum mandatory qualifications, skills, abilities, and knowledge bases stated in relevant job descriptions that have been developed and refined over the LTNC’s past decades of experience with housing-related activities. The LTNC is accustomed to announcing, recruiting, identifying, selecting, and hiring staff for its projects and therefore has time-tested hiring practices and processes we will use during the proposed LM-HIP.

Experience Promoting Racial Equity

Per page 33 of the modified HUD PRICE NOFO,

Due to the specific focus of Tribal Applicants on serving Tribal communities, Tribal Applicants will be presumed to meet the substantive goals of Executive Order 13985 and the Advancing Racial Equity requirements of this NOFO when Tribal Applicants carry out activities in accordance with program requirements for the benefit of Tribal communities. Accordingly, HUD is not requiring Tribal Applicants to submit an additional narrative unless they believe there are potential barriers to underserved communities equitably benefiting from proposed grant activities. If so, they should identify those barriers, detail steps to prevent, reduce, or eliminate those barriers, and identify how they will measure, track progress, and evaluate the effectiveness of efforts to overcome those barriers.

The Lumbee Tribe of North Carolina does not believe there are potential barriers to underserved communities in the four-county project area—which also represents tribal territory—equitably benefiting from proposed grant activities. All tribal members have a voice in the tribe’s actions and activities; the proposed LM-HIP will align with this strong commitment to “preserving for all time the Lumbee way of life and community, promoting the educational, cultural, social and economic well-being of Lumbee people, and securing justice and freedom for the Lumbee people”⁶⁵.

Experience Completing Environmental Reviews

For every construction or housing rehabilitation project we engage in, we conduct an environmental review compliant with the requirements of 24 CFR part 58 (cover sheets and examples can be provided).

Familiarity With Cross-Cutting Federal Requirements

Being experienced with receiving Federal and state grant funding and managing it appropriately, the LTNC is accustomed to complying with 2 CFR part 200 (the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), including maintaining awareness of any revisions and updates. Given the Tribe’s more than two decades of experience with housing rental and rehabilitation, we are very familiar with fair housing and nondiscrimination requirements as well as the Uniform Relocation Act (49 CFR part 24).

⁶⁵ The Lumbee Constitution. Available at https://3aa0349e-a4c3-4857-8f0a-2e7e416fac87.filesusr.com/ugd/756e16_72e7de6efe2f40549c0c49fcc88c8ad3.pdf.

Exhibit F: Match or Leverage

As Tribal applicants are exempt from cost match, the LLD—and its parent organization, the LTNC—will not provide matching or leveraging funds to support the proposed project.

If the LLD is awarded less funding than requested through PRICE, we will scale our budget appropriately and move forward with a smaller slate of activities for the proposed project: LM-HIP. Alternately, we may seek other sources of funding—Federal and non-Federal—through which to accomplish project activities at originally envisioned levels.

As the LTNC has nearly three decades of experience providing housing rehabilitation, repair, replacement, mitigation, and weatherization of homes of LMI Lumbee households who own and live in manufactured homes, we will continue to adapt to various contingencies and move forward with the funding that we have or can obtain, given that these housing-related activities continue to be a significant commitment on the part of our organization.

Exhibit G: Long-Term Effects of the Proposed LM-HIP Project

Relationship to Other Affordable Housing Opportunities in the Project Area

The LTNC works well with other affordable housing advocates and supporters in the project area. As safe, affordable, and sanitary housing for our members is a significant priority for the Tribe, we will continue to work with other stakeholders and policymakers to increase capacity in the affordable housing space in the project area both during and after the project period.

Ensuring Long-Term Affordability in the Project Area

The LTNC's commitment to financial education of its members and affordability of safe and sanitary housing stock for its members will ensure long-term affordability in the project area for the target population and communities. As we understand that it does in fact take a village for all to enjoy an appropriate quality of life, we will continue to use our collective resources to assist the neediest among us.

Promoting Stable Homeownership in the Long Term

Three of our proposed project activities—(1) home relocation out of trailer parks or floodplains via land acquisition assistance and/or assistance with home transport and setup costs, (2) financial education toward homeownership, and (3) down payment assistance—are aimed directly at promoting long-term, stable homeownership of both our tribal members' homes and the land on which they sit. These will decrease the numbers of tribal members who are victims of predatory lending and tax foreclosures, thereby increasing long-term housing stability for residents of manufactured housing.

Supporting Underserved Populations and Communities in the Long Term

The LTNC has people of color, vulnerable populations, and underserved communities among our members. As a result, we are intimately familiar with past and present needs of these groups and are able to project those needs into the future with what we consider to be a more than fair degree of accuracy, given our experience and expertise. Due to our nearly three decades of support for safe, sanitary, and affordable housing for our members, and the importance of that support to our past, current, and planned Tribal activities, we expect to continue to advance housing access and justice for our neediest members for the foreseeable future. In particular, our housing modifications and repairs for our physically disabled tribal members will comply with both general ADA requirements and the specific needs of the members served by LM-HIP, helping to keep tribe members' housing safe, sanitary, and affordable as they age in place.

Making Manufactured Housing in the Project Area Livable, Sustainable, and Resilient

Our proposed project activities focus on making our members' manufactured homes livable, sustainable, and resilient to the effects of climate change, including extreme weather, heat, and natural disasters (particularly flooding after hurricanes).

Our home rehabilitation, weatherization, mitigation, relocation services, replacement of dilapidated housing, and down payment assistance provided during this project—along with our indirect services, including financial and housing-related consultations, assessments, education, and advising—will support long-term positive outcomes such as reductions in health risks, reductions in exposure to environmental hazards, and increases in provision of safe, sanitary, and affordable housing in the four-county project service area for 30+ years.