

2024 Rural Housing Outreach

ACTIVITY:

B. Regulatory Activity: Housing for high-needs rural populations (12 C.F.R. § 1282.35 (c) (2)).

OBJECTIVE:

1. Support technical assistance programs that enhance the development capacity of organizations serving high-needs rural populations.

INFEASIBILITY:

☐ Check here if the Enterprise is submitting an infeasibility request for the objective.

SUMMARY OF RESULTS:

<i>Objective's components detailed in the Plan</i>	<i>Corresponding actions taken</i>	<i>Explanation of any deviations from the Plan (if applicable)</i>
<input checked="" type="checkbox"/> Partner with nonprofit organizations to deliver TA to 20 organizations working to develop or preserve housing for agricultural workers or Native American communities through RD 514/516 funding, HUD funding allocated for tribal housing, and/or LIHTC. Work with nonprofit partners to:	Target exceeded through 2024 actions; see subsequent implementation steps.	
<input checked="" type="checkbox"/> Assess the results of TA performed in 2023 and incorporate opportunities and strategies to strengthen the program's effectiveness and increase its scale in 2024.	Fannie Mae partnered with Enterprise Community Partners (ECP) and Community Resources and Housing Development Corporation (CRHDC) to provide technical assistance (TA) to multifamily housing developers for Native American communities and agricultural worker communities, respectively. Both organizations performed lookback analyses of work completed in 2023 and incorporated those findings into 2024 plans.	
<input checked="" type="checkbox"/> Plan the 2024 TA program and identify organizations for TA delivery (developers of farm labor housing and Native American housing).	In combination, programs under this objective sought to provide TA to at least 25 organizations serving high-needs rural populations (HNRP's).	
<input checked="" type="checkbox"/> Execute the 2024 TA program.	In combination, TA provided under this Objective supported 35 distinct HNRP projects.	



SUMMARY OF RESULTS CONTINUED:

<i>Objective’s components detailed in the Plan</i>	<i>Corresponding actions taken</i>	<i>Explanation of any deviations from the Plan (if applicable)</i>
<input checked="" type="checkbox"/> Analyze results of the 2024 TA program at the property level to determine success of the program and inform future work.	Both ECP and CRHDC provided detailed analyses summarizing 2024 TA and identifying lessons learned for future efforts to support HNRP developers. Notably, TA provided by these organizations directly supported 14 applications for funding in 2024, with at least seven having been funded by the end of 2024.	

SELF-ASSESSMENT RATING OF PROGRESS:

- ☐ Target met
- ☒ Target exceeded
- ☐ Target partially completed
- ☐ No milestones achieved

IMPACT:

- ☐ 50 – Very Large Impact
- ☒ 40
- ☐ 30 – Meaningful Impact
- ☐ 20
- ☐ 10 – Minimal Impact
- ☐ 0 – No Impact

IMPACT EXPLANATION:

1. How and to what extent were actions under this objective impactful in addressing underserved market needs, or in laying the foundation for future impact in addressing underserved market needs?

Native American Housing

ECP provided TA to 13 distinct Native American housing projects in 2024. Of those, seven organizations submitted applications for funding by the end of 2024, and three of the 2024 applicants received funding in the same year. In addition, two recipients of TA from 2023 received funding in 2024. It is possible other 2024 applicants will receive funding in 2025.

Agricultural Worker Housing

CRHDC provided TA to 22 distinct agricultural worker housing projects in 2024. Of those, seven organizations submitted applications to the USDA as part of the 2024 Notices of Solicitation Applications (NOSAs) for Rehabilitation or New Construction. By the end of 2024, four have been issued a USDA Notice to Proceed letter, indicating approval of funding. It is possible other 2024 applicants will receive a USDA Notice to Proceed letter in 2025.

In addition to one-on-one TA, CRHDC also held five educational sessions on the USDA 514/516 programs in 2024, reaching a total of 86 participants. These events focused on preparation for the newly issued NOSAs and training for awardees to prepare for closing, among other topics. In addition to multi-attendee events, CRHDC also conducted additional outreach to State Directors, the Rural Partners Network, and California Rural Housing to pursue viable potential TA recipients.



2. What did the Enterprise learn from its work about the nature of underserved market needs and how to address them?

Native American Housing

According to qualitative research with prior years' TA recipients, ECP concluded that a significant appetite remained for tribal multifamily housing developers to pursue state and federal affordable housing applications. Across partners, tribes reported demand for new housing development but lacked staff and experience to compete with hefty program requirements. Structuring TA to fulfill that role in a way that also develops internal capacity and doesn't increase costs for the tribe has been met with great success.

In 2024, ECP noted that it faced significant challenges when working with lower-capacity tribes. Many tribes struggle with internal operating capacity issues, such as hiring a housing director, organizing internal documents, and implementing compliance procedures. While these are common requests, they are often difficult for external providers to address. It's crucial to respect tribal sovereignty and decision-making processes. As a result, tribes may face limitations in strategizing to approach larger funding pools or effectively implementing existing funding until they increase their internal capacity. This is a key limitation of TA.

For most tribes, weekly sessions were helpful as check-ins, especially if looking at larger strategic planning for housing. The consistency and sustained progress were beneficial. However, this year ECP observed that multiple tribes benefited from more intense periods of TA, sometimes three meetings per week, in the weeks leading up to an application deadline. It has been a good practice to workshop the tribe's particular housing goal first, and then orient the TA cadence around it.

Many tribes faced similar challenges, including navigating large state and federal housing applications, inconsistent funding allocations, and increasing demand from community members. One common factor among tribes that successfully accessed TA for funding applications was leadership engagement. Regardless of organizational size, when leadership was actively involved and committed to results, TA consultants were able to gather the necessary feedback for successful applications. Timing also played a critical role, particularly when an upcoming application deadline was approaching. For tribes with an established plan or identified project site, starting TA two months before the deadline was typically sufficient, especially for mid-size grants.

Agricultural Worker Housing

Based on a survey of CRHDC's TA recipients in 2023, the biggest challenges TA recipients identified were:

- Administrative challenges engaging with the USDA NOSA process.
- Identifying eligible residents and maintaining full occupancy, in keeping with USDA requirements.
- Increased construction costs, particularly when a developer does not have an ability to obtain additional gap funding.

As a result, 2024 TA and associated resources were designed to prepare agricultural worker housing developers for the elements of the application process that were most challenging for past TA recipients.

According to CRHDC, lessons learned from its provision of 2024 TA include:

- Recipients commonly need training on topics such as financial management, project development, compliance with federal regulations and environmental reviews, organizational capacity, packaging funding applications, and acquiring gap financing.
- Successful TA consists of a combination of periodic engagement as well as ad-hoc engagement for emerging questions.
- Small organizations, such as those with fewer than 20 staff, and that are early in the project development process, are most receptive to support on applications.
- Potential improvement could come from more consistent communication with USDA Rural Development to TA providers and TA recipients.

3. Optional: If applicable, why was the Enterprise unable to achieve the Plan target?

N/A