

PY2019  
STATE OF WEST VIRGINIA  
ANNUAL ACTION PLAN  
AMENDMENT #4



WVCAD | WVHDF

# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

The State of West Virginia's 2019 Action Plan is part of the Five-Year Consolidated Plan covering 2015-2019. The Consolidated Plan and Annual Action Plan are required by the U.S. Department of Housing and Urban Development (HUD) as a prerequisite to receive funding through the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Pursuant to the authority by the State of West Virginia's Governor, Jim Justice, the West Virginia Development Office (WVDO) and West Virginia Housing Development Fund (WVHDF) will administer the above referenced federal funds on behalf of the State. The CDBG, ESG and HOPWA programs are administered by the WVDO. The WVHDF administers HOME and HTF funded programs. The WVDO serves as the lead agency for the State's Consolidated and Annual Action Plan. These State agencies have collaborated in the preparation of the annual Action Plan for program year 2019, beginning July 1, 2019 through June 30, 2020.

As guided by 24 CFR Part 91, the Annual Action Plan contains all required sections, priorities, and general strategies to allow for the implementation of the programs contained in this plan. It establishes goals for meeting priority needs over the next program year and reflects past performance. Additional documents related to the Annual Action Plan are submitted under the Grantee's Unique Appendices as required. These documents include the Update to the Analysis of Fair Housing Impediments and all supporting material, as well as documents related to public input derived through the Citizen Participation Plan.

As guided by 24 CFR Part 91, the Annual Action Plan contains all required sections, priorities, and general strategies to allow for the implementation of the programs contained in this plan. It establishes goals for meeting priority needs over the next program year and reflects past performance. Additional documents related to the Annual Action Plan are submitted under the Grantee's Unique Appendices as required. These documents include the Update to the Analysis of Fair Housing Impediments and all supporting material, as well as documents related to public input derived through the Citizen Participation Plan.

On March 27, 2020, the Coronavirus Act Relief and Economic Security Act (CARES), Public Law 116-136 was signed, providing \$5 billion for Community Development Block Grant (CDBG-CV), Emergency Solutions Grant (ESG-CV) and Housing Opportunities for Persons with AIDS (HOPWA-CV) to prevent, prepare for, and respond to the COVID-19 and the economic and housing impacts caused by this unprecedented crisis. Due to COVID-19, the Department of Housing and Urban Development (HUD) issued and signed on March 31, 2020 a "Mega Waiver". The West Virginia Development Office (WVDO) and the West Virginia Housing Development Fund (WVHDF) has applied and received approval for the following waivers under the "Mega Waiver" and received approval from HUD. Pursuant to John Gibbs' April 10, 2020, memorandum concerning the availability of waivers and suspensions of the CDBG, ESG, HOPWA, and HOME Program requirements in response to COVID-19 pandemic, requested the following to provide maximum flexibility to better

assist low to moderate-income households as they deal with the effects of the COVID-19 pandemic:

### **Citizen Participation Plan (CPP) Related Waivers**

Requested waiver/suspension: Citizen Participation Public Comment Period for Consolidated Plan Amendment  
Citations: Section 24CFR 91.105(c)(2) and (k), 24CFR 91.115(c)(2) and (i) and 24CFR 91.401  
Request: WVDO is requesting the reduction of the public comment period from 30 days to 5 days and amending the Citizen Participation Plan to notice the public of the change.  
Justification: The suspension will allow the State of West Virginia to respond quickly to the growing spread and effects of COVID-19.  
Requested waiver/suspension: Citizen Participation Reasonable Notice and Opportunity to Comment  
Citations: 24CFR 91.105(c)(2) and (k), 24CFR 91.115(c)(2) and (i) and 24CFR 91.401  
Request: WVDO is requesting the reduction of the notice of public comment period from 14 days to 7 days and amending the Citizen Participation Plan to notice the public of the change.  
Justification: The suspension will allow the State of West Virginia to respond quickly to the growing spread and effects of COVID-19.

### **ESG Related Waivers**

Requested waiver: HMIS Lead Activities

Citations: 24 CFR 576.107(a)(2)

Request: WVDO requests this waiver under condition that the recipient must be the HMIS Lead to pay costs under 24 CFR 576.102(a)(2) is waived to the extent necessary to allow any recipient to use ESG funds to pay costs of upgrading or enhancing its local HMIS to incorporate data on ESG Program participants and ESG activities related to COVID-19. This waiver is in effect for 6-months beginning on the date of this memorandum.

Waiver requested: Re-evaluations for Homelessness Prevention Assistance

Citations: 24 CFR 576.401(b)

Request: WVDO requests this waiver regarding required frequency of re-evaluations for homelessness prevention assistance under section 576.401(b) is waived for up to 2-years beginning on the date of this memorandum, so long as the recipient or subrecipient conducts the required re-evaluations not less than once every 6 months.

Requested waiver: Housing Stability Case Management

Citations: 24 CFR 576.401(e)

Request: WVDO requests this waiver whereas the recipients or subrecipients must require program participants to meet with a case manager not less than once per month to assist them in ensuring long-term housing stability, unless the Violence Against Women Act of 1994 or Family Violence Prevention and Services Act prohibits the recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services. Waiving the monthly case management requirement as specified below will allow recipients to provide case management on an as needed basis and reduce the possible spread and harm of COVID-19. This waiver is in effect for two months beginning on the date of this memorandum.

Waiver requested: Restriction of Rental Assistance to Units with Rent at or Below FMR

Citations: 24 CFR 576.106(d)(1)

Request: The WVDO requests this waiver because quickly moving people into permanent housing is especially critical in preventing the spread of COVID-19. Waiving the limit on rental assistance to rents that are equal to or less than the FMR, established by HUD, will assist recipients and subrecipients in more quickly locating additional units to house individuals and families experiencing homelessness. The FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning on the date of this memorandum. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard.

### **HOME Related Waivers**

WVHDF has received HUD approval for the following HOME Waivers/Suspensions in response to the COVID-19 pandemic, which provide maximum administrative flexibility to better assist low- and very low-income households as they deal with the effects of the COVID-19 pandemic.

Suspension of the 10% limit of the FY 2019 allocation and program income received for administrative and planning costs and increasing the limit up to 25%.

Reduction of the CHDO Set-Aside requirement to 0% for fiscal year 2019 allocation.

Suspension limiting the amount of CHDO operating assistance up to 5% of each annual HOME allocation and waiving the requirement that a CHDO not currently receiving CHDO Set-Aside funding for a specific project must expect to receive such funding within twenty-four months, and increase the limit up to 10%, permit a CHDO to receive funding to fill operating budget shortfalls, even if the amount exceeds the higher of \$50,000 or 50% of its annual operating budget, and not include a provision in the written agreement that the CHDO is expected to receive CHDO Set-Aside funds within twenty-four months of receiving the additional operating assistance.

A 100% reduction of Matching Contribution for HOME funds expended between October 1, 2019 and June 30, 2020. (Note: Matching Contribution remains effective from July 1, 2019 through October 1, 2019.)

### **HOPWA Related Waivers**

Requested Waiver: HOPWA – Self-Certification of Income and Credible Information on HIV Status

Citations: Source Documentation for Income and HIV Status Determinations, CFR 574.530, Recordkeeping

Request: WVDO requests this waiver to permit HOPWA grantees and project sponsors to rely upon a family member's self-certification of income and credible information on their HIV status (such as knowledge of their HIV-related medical care) in lieu of source documentation to determine eligibility for HOPWA assistance of families and grantees affected by COVID-19.

Requested Waiver: HOPWA – FMR Rent Standard

Citations: Rent Standard for Tenant-Based Rental Assistance (TBRA), 24 CFR 574.320(a)(2), Rent Standard

Request: WVDO requests this waiver regarding FMR rent standard limit permits HOPWA grantees to establish rent standards, by unit size, that are reasonable, and based upon rents being charged for comparable unassisted units in the area, taking into account the location, size, type, quality, amenities, facilities, management and maintenance of each unit. Grantees, however, are required to ensure the

reasonableness of rent charged for a unit in accordance with §574.320(a)(3). This waiver is required to expedite efforts to identify suitable housing units for rent to HOPWA beneficiaries and HOPWA-eligible families that have been affected by COVID-19, and to provide assistance to families that must rent units at rates that exceed the HOPWA grantee's normal rent standard as calculated in accordance with §574.320(a)(2).

Requested Waiver: HOPWA – Property Standards for TBRA

Citations: Property Standards for Tenant-Based Rental Assistance (TBRA), CFR 574.310(b), Housing Quality Standards

Request: WVDO requests this waiver enabling grantees and project sponsors to expeditiously meet the critical housing needs of the many eligible families that have been affected by COVID-19 while also minimizing the spread of the coronavirus.

Requested Waiver: HOPWA Space and Security

Citations: Adequate Space and Security, 24 CFR 574.310(b)(2)(iii), Space and security

Request: WVDO requests this waiver to enable grantees and project sponsors operating housing facilities and shared housing arrangements the flexibility to use optional appropriate spaces for quarantine services of eligible households affected by COVID-19. Optional spaces may include the placement of families in a hotel/motel room where family members may be required to utilize the same space not allowing for adequate space and security for themselves and their belongings.

### **ESG Related Waiver - Part II**

<div>Waiver requested: Documentation of At-Risk Eligibility</div><div></div><div>Citations: 24 CFR 576.2 (iii)</div><div></div><div>Request: Flexibility in Responding to Growing Local Need: In this environment, there is a substantial number of WV renters who are experiencing significant financial hardship but remain housed currently despite not being able to pay their rent. While they are not receiving immediate eviction notices and are not experiencing an imminent threat of housing termination, they are accruing rental arrears each month of non-payment, making it increasingly difficult to maintain housing after these relief efforts expire, and resulting in a potential cliff effect of mass eviction orders across the state overwhelming the homeless system. In response to the current

widespread need by residents who do not qualify as “at risk” under the current standards included in 24 CFR 576.2 (iii) as written and to decrease the future wave of evictions, this minor amendment are needed.

**Waiver requested: Short-term and Medium-term Rental Assistance**

**Citations: 24 CFR 576.106.4**

**Request: Flexibility in Responding to Growing Local Need:** In this environment, there is a substantial number of WV renters who are experiencing significant financial hardship but remain housed currently despite not being able to pay their rent. Households are accruing rental arrears each month of non-payment, making it increasingly difficult to maintain housing after these relief efforts expire, and resulting in a potential cliff effect of mass eviction orders across the state overwhelming the homeless system. This accruing rental arrears in many cases is already beyond the maximum rental arrears payment currently allowed within regulations of six months, and will still result in eviction in many instances as there are still months of unpaid rent to be paid to the landlord. Further, there is the potential that households can get behind in rent at different points during the COVID-19 crisis, and could need arrearages paid again as the situation is ever changing and the response needs to match this uncertain state. The State of WV requests to waive the limit of a one-time payment of rental arrearages for up to six months (576.106.4) and instead allow for more than one rental arrearages payment and more than six months if needed to keep a household housed. (Any number of months paid in arrearages will still follow the same guidelines regarding maximum number of months within a three-year period that can be served with HP funding).

**Requested Waiver: Homeless Definition Temporary Stays in Institutions of 90 Days or Less**

**Requested Waiver:** ESG - Homeless Definition – Temporary Stays in Institutions of 90 Days or Less

**Citations:** 24 CFR 576.2, definition of “homeless” (1)(iii)

**Request:** WVDO requests this waiver whereas an individual may qualify as homeless under paragraph (1)(iii) of the homeless definition in 24 CFR 576.2 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. This waiver is in effect until June 30, 2021. This waiver applies for ESG grants funded under the CARES Act as well as ESG grants funded under FY 2021 and earlier fiscal year appropriations acts, including grants that have yet to be awarded under those acts. With respect to ESG grants funded under the CARES Act and FY 2020 and earlier fiscal year ESG grant funds recipients use to prevent, prepare for, and respond to coronavirus, this waiver shall be deemed to be effective as of the date a State or unit of local government began preparing for coronavirus, which HUD shall presume to be January 21, 2020 -the date the first confirmed case of the coronavirus was reported in the United States. However, each recipient must maintain adequate documentation to assure this waiver is used retroactively only with respect to ESG-or ESG-CV-eligible activities the recipient or its subrecipients implemented to prevent, prepare for, and respond to coronavirus, including documentation demonstrating when their particular state or local government began preparing for coronavirus, such as notes on formal planning meetings or calls.

**Requested Waiver: HOPWA - Time Limits for Short-Term Housing Facilities and Short-Term Payments**

**Requested Waiver:** HOPWA – Time Limits for Short-Term Housing Facilities and Short-Term Rent, Mortgage, and Utility Payments

**Citations:** 24 CFR 574.330(a)(1), Time Limits

**Request:** WVDO requests use of this waiver for all HOPWA grants except those funded under the CARES Act or for the portion of a grantee’s FY 2020 formula funds that have been approved under its Annual Action Plan (AAP) for allowable activities to prevent, prepare for, and respond to the COVID-19 pandemic as described in section V. of Notice CPD-20-05.

On an individual household basis, grantees or project sponsors may assist eligible households for a period that exceeds the time limits specified in the regulations. A short-term supported housing facility may provide residence to any individual for a period of up to 120 days in a six-month period. STRMU payments to prevent the homelessness of the tenant or mortgagor of a dwelling may be provided for costs accruing up to 52 weeks in a 52-week period.

This waiver is in effect until June 30, 2021 for grantees and project sponsors that can meet the following criteria:

- a. The grantee or project sponsor documents that a good faith effort has been made on an individual household basis to assist the household to achieve permanent housing within the time limits specified in the regulations but that financial needs and/or health and safety concerns have prevented the household from doing so; and
- b. The grantee or project sponsor has written policies and procedures outlining efforts to regularly reassess the needs of assisted households as well as processes for granting extensions based on documented financial needs and/or health and safety concerns.

**Requested Waiver: HOPWA - Property Standards**

**Requested Waiver:** HOPWA – Property Standards

**Citations:** 24 CFR 574.310(b), Housing Quality Standards (HQS)

**Request:** WVDO requests use of this waiver as grantees and project sponsors continue to report difficulty in conducting the initial inspection of units due to social distancing guidelines; therefore, HUD is waiving the inspection requirement at 24 CFR 574.310(b), as further specified below to allow grantees and project sponsors to quickly move households into housing, which enables social distancing, and helps prevent the spread of COVID-19. Additionally, grantees and project sponsors will need time when



social distancing guidelines are no longer in effect to prepare staff to physically re-inspect units for HQS; therefore, HUD is extending the waiver beyond the date the state or local public health official has determined special measures are no longer necessary to prevent the spread of COVID-19 as described below.

This waiver is in effect until June 30, 2021 for grantees and project sponsors that can meet the following criteria:

- a. The grantee or project sponsor is able to visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS before any assistance is provided; and
- b. The grantee or project sponsor has written policies to physically reinspect the unit within 3 months after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.

**Requested Waiver: HOPWA - FMR Rent Standard**

**Requested Waiver:** HOPWA – FMR Rent Standard

**Citations:** 24 CFR 574.320(a)(2), Rent Standard

**Request:** WVDO requests use of this waiver as grantees must establish rent standards for their rental assistance programs based on FMR (Fair Market Rent) or the HUD-approved community-wide exception rent for unit size. Generally, the rental assistance payment may not exceed the difference between the rent standard and 30 percent of the family's adjusted income.

HUD originally waived the FMR rent standard requirement for tenant-based rental assistance for one year on March 31, 2020. On May 22, 2020 HUD waived this requirement for one year for all rental assistance types. Grantees and project sponsors continue to report COVID-19 related health and financial hardships for HOPWA-eligible households. Extending this waiver of the FMR rent standard limit, while still requiring that the unit be rent reasonable in accordance with §574.320(a)(3), will assist grantees and project sponsors in expediting efforts to identify suitable housing units for rent to eligible households experiencing the ongoing health and financial impacts of the COVID-19 pandemic and economic crisis.

The FMR requirement continues to be waived until June 30, 2021. Grantees and project sponsors must still ensure the reasonableness of rent charged for a unit in accordance with §574.320(a)(3).

**2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The State of West Virginia will continue to follow previously implemented performance measurements prescribed by HUD. All activities funded will address one of these three primary objectives which will provide an outcome of availability/accessibility, affordability and/or sustainability:

1. Provide decent affordable housing
2. Create economic opportunities
3. Create suitable living environments

Similarly, all funded activities will achieve one of the following:

1. Increase the supply of affordable rental housing: HOME Program approximately 74 units; and HTF Program approximately 50 units.
2. Support homeownership opportunities for low to moderate income first-time homebuyers: HOME Program - approximately 10 units.

3. Increase affordable, accessible housing opportunities for special needs populations: HOPWA and ESG Program - 210 individuals.
4. Support local efforts to assure that households in a housing crisis are able to obtain and/or maintain housing stability: HOPWA and ESG Program - 2100 individuals.
5. Support job creation or retention efforts: CDBG Program - 0 jobs.
6. Support local community development efforts to assist low- and moderate-income citizens to achieve an improved quality of life by supporting locally developed strategies to protect, maintain, and expand access to facilities, and services and to revitalize deteriorating downtown and residential neighborhood areas: CDBG Program - 0 facilities.
7. Support local government efforts to provide affordable infrastructure systems to strengthen the foundations for economic growth and alleviate conditions that affect environmental quality, public health, or welfare: CDBG Program – 5,972 persons will benefit from new and improved infrastructure systems, to include water and wastewater and broadband. Broadband Planning Grants will benefit 10 counties within the State of West Virginia.
8. Respond quickly to the growing spread and effects of COVID-19.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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For FY 2018 program year, 7-1-17 through 6-30-18, the State achieved the following outcomes:

#### 1. Increase the supply of affordable rental housing:

- HOME CHDO: Construction of 7 Single Family housing units and 12 rental units.
- HOME Rental: 89 rental units.
- HOME CHDO Operating Assistance Grants: 7 CHDOs.

#### 2. Supporting homeownership opportunities for low to moderate income first-time homebuyers:

NewHOME Program: Acquisition of 1 new units and acquisition of 12 existing units.

3. Increase affordable, accessible housing opportunities for special needs populations:

- HOPWA and ESG Program:
- During the last program year, 6,500 people were assisted through the ESG program.
- Total HOPWA housing subsidy assistance 172 households.

4. Enhance the quality of housing for low to moderate income homeowners:

- HOME Program: One single family owner occupied rehabilitation loan in response to the 6-23-16 Flood.

5. Support local efforts to assure that households in a housing crisis are able to obtain and/or maintain housing stability:

- ESG Programs: 1,719 individuals were able to obtain housing stability.

6. Support job creation or retention efforts:

- CDBG Program: No projects were awarded in 2018.

7. Support local community development efforts to assist low-and moderate-income citizens to achieve an improved quality of life by supporting locally developed strategies to protect, maintain, and expand access to facilities, and services and to revitalize deteriorating downtown and residential neighborhood areas:

- Each infrastructure project that received CDBG funding assisted low-to moderate-income citizens in achieving an improved quality of life through the development of clean, reliable water, wastewater and broadband.
- The CDBG projects either improved the current infrastructure or extended services to previously unserved areas, and this continues to be a critical need in many areas of West Virginia.
- During the last program year, 7 CDBG Infrastructure projects were completed through the state.

8. Support local government efforts to provide affordable infrastructure systems to strengthen the foundations for economic growth and alleviate conditions that affect environmental quality, public health, or welfare:

- CDBG Program: Invested \$13,084,044 in 20 public infrastructure projects (9 water and sewer and 11 broadband development), serving approximately 5,972 persons. Broadband Planning grants benefited approximately 10 counties in the State of West Virginia.

### **Additional text for Evaluation of past performance**

In addition to the above outcomes, the CDBG program implemented the following with plans to continue to build upon such activities:

- CDBG Implementation Meetings: Mandatory implementation meetings were conducted with each new grantee, in which WVDO staff reviewed the goals and objectives of the CDBG program, and specific requirements concerning environmental review, labor compliance, Section 3, Fair Housing, procurement, citizen participation and other rules and regulations.
- Fair Housing: The WVDO and the WVHDF conducted an interim update to the Analysis of Impediments to Fair Housing in 2018. Additionally, the WVDO Compliance Unit monitors all Grantee's Fair Housing activities annually to ensure compliance.

Environmental Review: The WVDO continues to administer procedures to ensure that all projects fully comply with the environmental review requirements under 24 CFR Part 58.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

In developing the annual Action Plan, the WVDO and WVHDF followed the State's Citizen Participation Plan and consulted with a broad range of local, regional and state organizations, including local units of government, continuums of cares (CoCs) and other interested parties through outreach efforts. This draft plan was published on the West Virginia Department of Commerce website and was widely distributed via email and in hard copies as outlined in the plan upon request. The State encouraged all citizens to participate in the planning process. Accommodations were made for non-English speaking persons and persons with mobility, visual, or hearing impairments as needed.

Three public hearings were publicized at least 14 days in advance in six major newspapers across the State and by website postings, distribution through email, and available within State offices. A copy of the draft plan was emailed to each of the State's Regional Planning and Development Councils. The first hearing was conducted on April 10, 2019 to obtain citizens' views about housing, homelessness, public facilities and services and non-housing community development needs in the State as directed by the citizen participation plan. The second hearing was held on April 16th and the third on April 25th in different locations across the state. The public was invited to submit written comments to the plan within a comment period which began on April 1st and concluded on May 1st, 2019.

The draft CARES ACT Amendment Public Notice of the amendment to the FY2019 and 5 day comment period was publicized at least 7 days in advance in six major newspapers across the State, posted on the

WVCAD and WVHDF website and distribution through email. A copy of the CARES Act amended FY2019 Annual Action Plan and 2020 Amended Citizen Participation Plan was emailed to each of the State's Regional Planning and Development Councils, Continuums of Care, posted on the WVCAD website and available to the public upon request. The State encouraged all citizens to participate in the planning process. Accommodations were made for non-English speaking persons and persons visual or hearing impairments as needed.

Amendment #2 CDBG CARES Act round 3 was publicized at least 7 days in six major newspapers across the State, posted on the WVCAD and WVHDF website, and distributed through email. A copy of the CARES Act amended FY2019 Annual Action Plan was emailed to each of the State's Regional Planning and Development Councils, Continuums of Care, posted on the WVCAD website and available to the public upon request. The State encouraged all citizens to participate in the planning process. Accommodations were made for non-English speaking persons and persons visual or hearing impairments as needed.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The State received a variety of comments regarding the various programs during the public hearings as well as submitted during the comment period. Wherever possible, public hearings were structured to incorporate discussion of specific local needs.

Please refer to Citizen Participation Outreach chart in section AP-12 for an overview of all comments, including the verbal comments and written comments submitted by citizens during the public meeting process. All comments were considered as the Action Plan was developed and finalized.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments were considered in the development of the plan. Comments or views were gathered through direct participation at the public hearing as well as written comments provided during the public comment periods.

## **7. Summary**

WVDO and WVHDF will administer the previously referenced federal programs on behalf of the State of West Virginia, with the WVDO acting as the lead agency for the State's Consolidated and Annual Action Plan.

All activities funded will address one of the three primary objectives of providing decent affordable housing, creating economic opportunities, and/or creating suitable living environments, which will provide an outcome of availability/accessibility, affordability, and/or sustainability.

In developing the Action Plan, the WVDO and WVHDF followed the State's Citizen Participation Plan and consulted with a broad range of local, regional and state organizations, including local units of government, continuums of cares (CoCs) and other interested parties through outreach efforts. The draft plan was available on the West Virginia Department of Commerce's website, circulated via email, and three public hearings were held in different regions of the State to foster public participation. Written comments were received during this process and all consultations have been considered during the development of the Annual Action Plan.

**PR-05 Lead & Responsible Agencies - 91.300(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	WEST VIRGINIA	West Virginia Department of Economic Development
HOPWA Administrator	WEST VIRGINIA	West Virginia Department of Economic Development
HOME Administrator	WEST VIRGINIA	West Virginia Housing Development Fund
ESG Administrator	WEST VIRGINIA	West Virginia Department of Economic Development
	WEST VIRGINIA	West Virginia Housing Development Fund

**Table 1 – Responsible Agencies**

**Narrative**

The HOME Investment Partnerships and Housing Trust Fund will be administered by the WVHDF.

**Consolidated Plan Public Contact Information**



Two separate agencies -- the West Virginia Development Office and the West Virginia Housing Development Fund -- administer the five key programs included in the HUD Consolidated and Annual Action Plan. Each agency organized and implemented planning activities to include key contacts in the development of the plan. The West Virginia Department of Commerce, West Virginia Development Office is the lead agency and administers the CDBG, ESG and HOPWA programs as detailed in the Consolidated Plan. The HOME Investment Partnerships and Housing Trust Fund will be administered by the West Virginia Housing Development Fund.

## **AP-10 Consultation - 91.110, 91.300(b); 91.315(l)**

### **1. Introduction**

The State of West Virginia works annually with a variety of individuals and organizations to identify gaps in services and identify solutions to such gaps. To supplement this ongoing stakeholder engagement, the State conducted three public hearings and made the draft 2019 Annual Action Plan available for comment as guided by the Citizen Participation Plan. The draft plan was also posted to the West Virginia Development Office website for comment.

As required by the Citizen Participation Plan, the partner agencies (WVDO and WVHDF) distributed information about the planning process and sought to engage involvement from a wide constituency, including participation from low and moderate-income persons, organizations that serve vulnerable segments of the population, related constituent groups, individuals living in slum and blighted areas, and in areas where CDBG, HOME, HTF, ESG and HOPWA funds are used. In addition, the State provided a copy of the draft plan to the 11 Regional Planning and Development Councils. The Regional Councils represent the cities and counties within a specific geographic area and encourage a regional approach to community and economic development initiatives. Realizing that many issues transcend city and county boundaries, the Regional Councils are comprised of representatives from each unit of local government.

### **Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies**

In the last several years, affordable housing providers and representatives of health, mental health, housing and public service agencies have substantially strengthened their networking and coordination activities. The State has actively encouraged and participated in these efforts and will continue to do so. In consultation with the 4 CoCs in the state, the WVDO acts as a conduit for leading the process of identifying barriers and strategies to address the needs of those experiencing homelessness and those at risk of becoming homeless.

The State of West Virginia works with the following agencies to enhance coordination:

- Social service agencies: The State provides funds to improve services to low and moderate income persons
- Housing providers: The State provides funds to improve the quality of emergency shelters
- Private industry, business and developers: to streamline efforts in efficiently and effectively utilize all available resources

Each year as part of the homeless programs application process, local agencies and organizations are invited to submit proposals for funding for eligible activities. These groups participate in the planning process by attending public hearings, informational meetings and completing reports as necessary.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The State of West Virginia supports all 4 CoCs: (Northern Panhandle CoC (NPC), Balance of State CoC (BOS), Kanawha Valley Collective CoC (KVC) and Cabell-Huntington-Wayne CoC (CHW) in efforts to address the needs of the homeless in the community. WVDO requires that all recipients of ESG funds participate in the annual Point in Time (PIT) count and Housing Inventory County (HIC) Shelter count. All recipients of ESG funding are required to be active members in the CoC which covers the provider's service area and to participate in that CoCs coordinated assessment process.

The State of West Virginia has worked to restructure its homeless assistance funding to better align with the State and Federal goals to reduce the number of individuals and families experiencing homelessness, shorten the length of time persons are homeless, and to reduce the number of people returning to homelessness.

**Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The WVDO coordinates with partners in the 4 CoCs and external stakeholders to ensure that the ESG program is part of an integrated, statewide strategy to ending homelessness and improving housing and stability outcomes for families and individuals.

Allocation of ESG funds: Funding availability is announced by the WVDO annually. Applications are emailed to past ESG funding recipients and all CoC leads for information distribution. Applications are also available through the WVDO website for any new applicants wishing to apply. Applications are reviewed based on the proposed implementation of eligible activities and ability to meet performance and compliance objectives. During the review process, all four CoCs are consulted to ensure that applicants are active members of the CoC, that they participate in the Point in Time count and that the policies and practices of the applicants reflect their ability to meet the needs of the population to be served as defined by the CoC. Given the relationship with three of the four CoC's in the State as direct recipients of ESG funding, it is challenging to balance the input of the CoC's. On-going communication and coordination with the CoC's and the national trend have aided the State to determine the percentage of funds that go into each ESG funded activity. Additionally, review of needs across the state

voiced by CoC's compared with data drive these determinations. It is the goal of the State to continue coordination with CoCs through attendance at meetings to continue to understand trends and community needs and adjust the program accordingly.

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Policies and procedures for HMIS: The four CoCs in the State of West Virginia identify an HMIS lead which serves on a statewide HMIS steering committee. This steering committee works to develop statewide policies and procedures. WVDO is a member of the statewide HMIS steering committee.

## **2. Agencies, groups, organizations and others who participated in the process and consultations**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Region I Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
2	<b>Agency/Group/Organization</b>	Region II Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
3	<b>Agency/Group/Organization</b>	Region III Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.

4	<b>Agency/Group/Organization</b>	Region IV Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
5	<b>Agency/Group/Organization</b>	Region V Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
6	<b>Agency/Group/Organization</b>	Region VI Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.



7	<b>Agency/Group/Organization</b>	Region VII Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
8	<b>Agency/Group/Organization</b>	Region VIII Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
9	<b>Agency/Group/Organization</b>	Region IX Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.

1 0	<b>Agency/Group/Organization</b>	Region X Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
1 1	<b>Agency/Group/Organization</b>	Region XI Planning and Development Council
	<b>Agency/Group/Organization Type</b>	Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The WVDO works closely with the State's 11 Regional Planning Development Councils in the administration of the CDBG program. Consultations throughout the year included targeted training events, administrative meetings, phone conferences, and frequent communication with project teams, which include units of local government. This cooperative relationship is ongoing and collaborative, resulting in constant feedback for effective program design and administration.
1	<b>Agency/Group/Organization</b>	RELIGIOUS COALITION FOR COMMUNITY RENEWAL
2	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
1	<b>Agency/Group/Organization</b>	CHANGE, INC.
3	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
1 4	<b>Agency/Group/Organization</b>	NORTH CENTRAL WV COMMUNITY ACTION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
1 5	<b>Agency/Group/Organization</b>	Mountain Opportunities Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
1 6	<b>Agency/Group/Organization</b>	Community Action of South Eastern WV (CASE)
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
1	<b>Agency/Group/Organization</b>	COALFIELD DEVELOPMENT CORPORATION
7	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
1	<b>Agency/Group/Organization</b>	FAIRMONT COMMUNITY DEVELOPMENT PARTNERSHIP
8	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.

1 9	<b>Agency/Group/Organization</b>	MOUNTAIN CAP OF WEST VIRGINIA, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Community Action Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
2 0	<b>Agency/Group/Organization</b>	STOP ABUSIVE FAMILY ENVIRONMENTS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
2 1	<b>Agency/Group/Organization</b>	HUNTINGTON HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
2	<b>Agency/Group/Organization</b>	MINGO COUNTY HOUSING AUTHORITY
2	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Correspondent Lender
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
2	<b>Agency/Group/Organization</b>	YWCA Charleston
3	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Victims of Domestic Violence Service-Fair Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This consultation focused on ways in which the WVDO and WVHDF could partner with the YWCA Charleston and related agencies to affirmatively further Fair Housing. This consultation was requested by the WVDO to explore an issue identified in the State's Analysis of Impediments to Fair Housing, "Unacceptable Levels of Sexual Harassment in Rental Housing." Discussion points included potential partner organizations and opportunities to increase awareness of this issue and subsequently develop action items to address it.
2 4	<b>Agency/Group/Organization</b>	West Virginia Geological and Economic Survey
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The State is coordinating and developing broadband projects with the West Virginia Broadband Enhancement Council, the West Virginia Geological and Economic Survey, Office of GIS Coordination, the State's Regional Planning and Development Councils, and other state and federal agencies to facilitate the expansion of this critical infrastructure into unserved and underserved areas of West Virginia.
2 5	<b>Agency/Group/Organization</b>	West Virginia National Guard
	<b>Agency/Group/Organization Type</b>	Other government - Federal Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Military

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The State is coordinating and developing broadband projects with the West Virginia Broadband Enhancement Council, the West Virginia Geological and Economic Survey, Office of GIS Coordination, the State's Regional Planning and Development Councils, and other state and federal agencies to facilitate the expansion of this critical infrastructure into unserved and underserved areas of West Virginia.
2 6	<b>Agency/Group/Organization</b>	West Virginia Air National Guard
	<b>Agency/Group/Organization Type</b>	Other government - Federal Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Military
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The State is coordinating and developing broadband projects with the West Virginia Broadband Enhancement Council, the West Virginia Geological and Economic Survey, Office of GIS Coordination, the State's Regional Planning and Development Councils, and other state and federal agencies to facilitate the expansion of this critical infrastructure into unserved and underserved areas of West Virginia.
2 7	<b>Agency/Group/Organization</b>	West Virginia Broadband Enhancement Council
	<b>Agency/Group/Organization Type</b>	Other government - State Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The State is coordinating and developing broadband projects with the West Virginia Broadband Enhancement Council, the West Virginia Geological and Economic Survey, Office of GIS Coordination, the State's Regional Planning and Development Councils, and other state and federal agencies to facilitate the expansion of this critical infrastructure into unserved and underserved areas of West Virginia.
2 8	<b>Agency/Group/Organization</b>	WEST VIRGINIA HOUSING DEVELOPMENT FUND
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Housing Finance Agency
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Coordination of the State Analysis of Impediments to Fair Housing and the Assessment of Fair Housing. Promotion of events related to Fair Housing.
2 9	<b>Agency/Group/Organization</b>	WV Human Rights Commission
	<b>Agency/Group/Organization Type</b>	Services - Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Civil Rights Advocate
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Coordination of the State Analysis of Impediments to Fair Housing and the Assessment of Fair Housing. Discussion of partnerships for events and training.

3 0	<b>Agency/Group/Organization</b>	WV Childhood Lead Poisoning Prevention Program
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Child Welfare Agency Other government - State Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This consultation provided information concerning the State's strategy for collecting and analyzing information related to lead-based paint in children, 72 months of age or less. The information is derived from the Healthy Homes Lead Poisoning Surveillance System (HHL PSS). West Virginia Code, Chapter 16-35-4a, requires systematic blood lead level screening of children, with reporting to the State Health Department.

**Identify any Agency Types not consulted and provide rationale for not consulting**

No agency types were specifically excluded and all comments and suggestions were considered.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	WV Coalition to End Homelessness	The Strategic Plan and the CoC both strive to reduce an individual's time homeless, reduce recidivism, expedite housing placement via Coordinated Entry, and spearhead the Housing First approach through the State's shelter system.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

The Cabell-Huntington-Wayne Continuum of Care has a partnership with the local health department that informs them of complaints against any unit regarding lead. At this time, that is the only active partnership with state or local health or child welfare agencies that monitor a master list of housing units containing lead. However, subrecipients complete the required lead inspection to assure that families are not being placed in buildings/units with lead. Subrecipients, should they encounter a unit with lead, records such and removes said units from availability within their agency. The State will work with each CoC to coordinate a partnership moving forward that monitors such information.

In addition to the required assessment, record keeping and education, some subrecipients have additional procedures in place regarding lead identification and associated actions. Some subrecipients test students for EBLL when entering the Head Start Program and track within that program. Others work with clients who have reported lead poisoning and their healthcare providers and report incidents of lead poisoning to the WV Bureau of Public Health for tracking.

## **AP-12 Participation - 91.115, 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The State of West Virginia 2019 Action Plan was developed with public input as per the Citizen Participation Plan. The 2019 draft plan was published on the WVDO website on April 1st, 2019 and was distributed via email and provided via paper copy as requested. An executive summary of the draft plan was sent to the State's 11 RPDCs to circulate to the mayors and county commissions in each region. A complete copy of the draft Con Plan was placed in each of the RPDC offices, and a public notice of its availability for review and comment was published in newspapers of general local circulations.

Three public hearings were scheduled to review the plan and provide opportunities for discussion. The WVDO and WVHDF hosted hearings various locations throughout the State during the month of April. In addition, hearings were located at a variety of venues to provide an array of input from individuals and/or agency representatives. These hearings provided an opportunity for in-depth discussion of specific local needs as they relate to each program.

The following public hearings were scheduled to review the PY 2019 Annual Action Plan:

April 10, 2019 (Wednesday)

2:30-4:00 p.m.

WV Housing Development Fund

First Floor Training Room

5710 MacCorkle Ave, S.E. Charleston, WV 25304

April 16, 2019 (Tuesday)

4:00-5:30 p.m.

West Virginia University -- Beckley

Robert C. Byrd Learning Building

3rd Floor, Room 322

Beckley, WV 25801

April 25, 2019 (Thursday) 2:30 - 4:00 p.m. Fairmont-Morgantown Housing Authority

Multi-Purpose Room

103 12th Street

Fairmont, WV 26554

A 30-day public comment period was provided for review and consultation following the availability of the plan.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community  Residents of Public and Assisted Housing	A public hearing was held at West Virginia Housing Development Fund in Charleston, WV on April 10, 2019.	No comments were received.	Not applicable. No comments were received during the public hearing in Charleston, WV on April 10, 2019.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community Residents of Public and Assisted Housing	A public hearing was held at WV University - Beckley in the Robert C. Byrd Learning Center on April 16, 2019.	One attendee stated that he would like for the CDBG awards to be announced earlier in the year and would like for the CDBG application process to be earlier in the year. It was noted that it is difficult to strategically plan and apply for new CDBG funding when awards have not been made for the previous year.	Not applicable. All comments were received during the public hearing in Beckley, WV on April 16, 2019. The State of West Virginia will understand the need for a quick turn around with regards to project decisions and will work towards expediting the awards process.	

3	Public Hearing	Non-targeted/broad community  Residents of Public and Assisted Housing	A public hearing was held at Fairmont-Morgantown Housing Authority on April 25, 2019.	One attendee requested that the WVDO consider adding demo to the FY19 Action Plan. Additionally, another attendee requested that the WVDO consider moving up the application process as to not delay awards.	Comments were accepted and considered during the development of this the FY 2019 Annual Action Plan. Demolition is currently not a part of the State of West Virginia's Consolidated Plan and historically has not been a high priority for the State. To address this request, the State will consider adding Demolition during the creation of the next 5-year consolidated plan. The State of West Virginia understands the need for a quick turn around with regards to project decisions and will work towards	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
					expediting the awards process.	
5	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft annual action plan and regional public hearings was placed in the Charleston Gazette on 3/24/2019.	No comments were received.	N/A.	
6	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft annual action plan and regional public hearings was placed in the Dominion Post on 3/24/2019.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft annual action plan and regional public hearings was placed in the Herald-Dispatch on 3/24/2019/	No comments were received.	N/A.	
8	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft annual action plan and regional public hearings was placed in the Register-Herald on 3/24/2019.	No comments were received.	N/A.	
9	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft annual action plan and regional public hearings was placed in The Journal on 3/24/2019.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft annual action plan and regional public hearings was placed in the Wheeling News Register on 3/24/2019.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
11	Distribution of Draft Plan	Consultation with Regional Planning and Development Councils	The draft plan is provided to each of the State's Regional Planning and Development Council. The State requests that a copy is available in each office for public review as requested. Agency personnel are also asked to review the plan and provide comments and suggestions regarding local needs.	No comments were received.	N/A.	
12	Internet Outreach	Non-targeted/broad community	The 2019 Annual Action Plan draft was available on the WVDO website for public review and comment	No comments were received.	N/A.	<a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
13	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT amendment annual action plan was published in the Charleston Gazette on 6/7/2020.	No comments were received.	N/A.	
14	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT amendment annual action plan was published in the Dominion Post on 6/7/2020.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
15	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT amendment annual action plan was published in the Herald-Dispatch on 6/7/2020.	No comments were received.	N/A.	
16	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT amendment annual action plan was published in the Register-Herald on 6/7/2020.	No comments were received.	N/A.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
17	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT amendment annual action plan was published in the The Journal on 6/7/2020.	No comments were received.	N/A.	
18	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT amendment annual action plan was published in the Wheeling News Register on 6/7/2020.	No comments were received.	N/A.	
19	Internet Outreach	Non-targeted/broad community	The 2019 AAP CARES ACT amendment was available on WVDO website for public comment.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
20	Distribution of Draft Plan	Consultation with Regional Planning and Development Councils and Other Stakeholders	The draft CARES Act amendment was provided to each of the State's Regional Planning and Development Council and stakeholders list.	No comments were received.	N/A.	
21	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT annual action plan amendment #2 was published in the Charleston Gazette on 11/8/2020.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
22	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT annual action plan amendment #2 was published in the Dominion Post on 11/8/2020.	No comments were received.	N/A	
23	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT annual action plan amendment #2 was published in the Herald Dispatch on 11/8/2020.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
24	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT annual action plan amendment #2 was published in the Register-Herald on 11/8/2020.	No comments were received.	N/A.	
25	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT annual action plan amendment #2 was published in the The Journal on 11/8/2020.	No comments were received.	N/A.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
26	Newspaper Ad	Non-targeted/broad community	An ad concerning the FY 2019 draft CARES ACT annual action plan amendment #2 was published in the Wheeling News Register on 11/8/2020.	No comments were received.	N/A.	
27	Internet Outreach	Non-targeted/broad community	The 2019 AAP CARES ACT amendment #2 was available on the WVDO and WVHDF website.	No comments were received.	N/A.	<a href="https://wvcad.org/resources">https://wvcad.org/resources</a>
28	Distribution of Draft Plan	Consultation with Regional Planning and Development Councils and Other Stakeholders	The draft CARES Act amendment #2 was provided to each of the State's Regional Planning and Development Councils, CoC and stakeholder list.	No comments were received.	N/A.	

**Table 4 – Citizen Participation Outreach**



## Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

This plan is prepared as a collaborative effort of two agencies: The West Virginia Development Office is responsible for the Community Development Block Grant program, the Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS and the West Virginia Housing Development Fund is responsible for the Home Investment Partnerships Program and Housing Trust Fund programs.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	13,672,767	0	0	13,672,767	13,672,767	The State will continue to invest in critical infrastructure and broadband projects in low- and moderate-income areas.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	4,729,494	2,000,000	0	6,729,494	6,729,494	



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	512,579	0	0	512,579	512,579	Funds are used to leverage additional resources for housing assistance and supportive services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,581,574	0	0	1,581,574	1,581,574	Funds require 100% matching contributions. Funds are used leverage additional resources for homelessness prevention, rapid re-housing, emergency shelter operations and case management services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,000,000	10	0	3,000,010	3,000,010	
Housing Trust Fund	public - federal	Acquisition Admin and Planning Multifamily rental new construction Multifamily rental rehab	3,000,000	0	0	3,000,000	3,000,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Other	12,857,18 0	0 0	0 0	12,857,18 0	12,857,18 0	The State will continue to invest in all ESG projects from the effects of COVID-19 statewide.
Other	public - federal	Admin and Planning Permanent housing in facilities Rental Assistance STRMU Supportive services TBRA	84,023	0	0	84,023	84,023	The State will continue to invest in all HOPWA projects from the effects of COVID-19 statewide.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Public Improvements Public Services Other	20,250,608	0	0	20,250,608	20,250,608	The State will continue to invest in public facilities, public service, planning ,TA and Admin projects from the effects of COVID-19 in low- and moderate-income area.

Table 1 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The State of West Virginia will utilize multiple sources of state, federal, local, and private funds to address the needs identified in this Action Plan.

CDBG:

The CDBG Program does not require a match (apart from Planning Grants, which require a 10% cash match); however, credit is given for leveraged funds during the review process. Sources of leveraged funding frequently include:

- Infrastructure and Jobs Development Council (IJDC) Grants and Loans
- Drinking Water Revolving Loan Funds (DWTRF)
- Clean Water Revolving Loan Funds (CWSRF)
- West Virginia Water Development Authority

- Local Lending Institutions
- Local Funds
- Private Resources
- State Resources
- U.S. Department of Agriculture - Rural Development
- Appalachian Regional Commission
- U.S. Economic Development Authority
- U.S. Army Corps of Engineers
- CDBG-CV1, CDBG-CV2, and CDBG-CV3 do not require a match or leverage funds

HOME:

Any HOME Program match obligation incurred by the State during FY 2019 may be met through eligible State affordable housing activities, including, but not limited to, the following:

- Mortgage Revenue Bond Program
- LAMP Program
- Payment of HOME Originator fees from the general funds of the WVHDF
- Down payment/Closing Cost Assistance Program
- Development Financing Program (eligible multi-family project financing)
- Affordable Housing Fund

The State may use additional sources of match to meet any match obligation if it determines that additional sources are necessary and eligible.

In addition, HOME Rental and HTF funds will be leveraged with Low-Income Housing Tax Credits. As a result developers will increase the supply of safe, rental housing for households at or below 30%, 40% AMI, 50% AMI, and 60% AMI.

ESG:

The ESG Program requires a dollar-for-dollar match in non-ESG funds from the State for their allocated amount. To meet this requirement, the State requires that applicants for State ESG funding provide a dollar-for-dollar match for their program costs. The matching requirement can be met with either cash or non-cash contributions of in-kind or donated resources as guided by federal regulation. ESG-CV 1 and ESG-CV 2 do not require a match.

HOPWA:

HOPWA subrecipients report on all sources of leveraging utilized to assist households in the HOPWA program. The leveraging information gives the state an idea of the community collaborations subrecipients are undertaking, whether subrecipients can reach their leveraging goals set out in their annual action plans, and if they are utilizing a variety of available resources to serve HOPWA eligible households. HOPWA-CV does not require a match.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

To facilitate the development of adequate infrastructure systems, the State has identified as a priority of the CDBG program, local governments may utilize publicly owned land for planned infrastructure improvements. These improvements benefit the entire community. Examples may include existing or acquired property that will serve as the location of public improvement facility, such as a water treatment facility or wastewater treatment facility. In certain circumstances, new installations for water, wastewater or broadband may be constructed in existing rights of way or through an existing easement. Local governments may also acquire property as needed for the provision of adequate water, wastewater and broadband facilities and distribution systems.

CDBG funds may be used to pay for the cost of identifying the property to be acquired, appraisals, the preparation of legal documents, and other costs associated with acquisition required to complete a CDBG project. Such expenses qualify under the area benefit category for infrastructure projects that serve a primarily residential area consisting of residents who are at least 51% low- and moderate-income persons.

**Discussion**

The WVHDF HOME Program anticipates the use of the HUD HOME award, estimated Program Income, and leveraged funds to successfully implement all aspects of the HOME Program.

The WVHDF HTF Program anticipated the use of the HTF award, and estimated Program Income, and leveraged funds to successfully implement all aspects of the HTF Program.



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 2 – Goals Summary

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Development of Public Infrastructure
	<b>Goal Description</b>	<p><b>CDBG Water and Sewer Infrastructure:</b> Grant funding may be provided to local governments in the development of water and sewer infrastructure projects. Estimated number of persons to be assisted is 7,477.</p> <p><b>CDBG Technology and Innovation:</b> Grant funding may be provided to local governments in the development of broadband infrastructure projects or for Planning Only projects for feasibility studies that support future infrastructure development. The total estimated number of persons to be assisted under this category in FY 2019 is 1,000.</p> <p><b>CDBG Disaster Resilience and Recovery:</b> Grant funding may be provided to local governments for Disaster Recovery and Resilience projects. For 2019 the State is not allocating a specific amount for this activity but will utilize any available funds on an as needed basis. This is based on the lack of applications received for this activity in the previous year.</p>

2	<b>Goal Name</b>	Increase affordable, accessible housing
	<b>Goal Description</b>	
3	<b>Goal Name</b>	Job creation and retention
	<b>Goal Description</b>	
4	<b>Goal Name</b>	ESG Shelter Goal 2
	<b>Goal Description</b>	<p>&lt;div&gt;ESG program funds will be used to provide overnight emergency shelter to individuals and families experiencing homelessness. This goal will address the need to reduce the number of individuals and families experiencing homelessness, shorten the length of homelessness to less than 30 days, and reduce the homelessness recidivism rate.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;&lt;div&gt;ESG-CV 1 and ESG-CV 2: Grant funding may be provided to non-profit organizations to respond to, prevent the spread of, and prepare for the effects of COVID-19 within the full range of eligible ESG. The State of West Virginia may directly administer ESG CV funding. Funding will be released in separate allocations to adequately respond to COVID-19 in connecting homeless individuals and households to emergency shelter and housing resources. Any remaining funds not allocated during the first allocations to respond to COVID-19 during year one of funding will be reserved for response during year two of these ESG-CV initial allocations by HUD. HMIS/DV database projects will be eligible.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;</p>

5	<b>Goal Name</b>	ESG ReHousing and Prevention Goal 1
	<b>Goal Description</b>	<p>&lt;div&gt;ESG Program funds will be used to provide Rapid Rehousing and Homelessness Prevention activities to low and very low income individuals and families. This goal will address the need to increase flexibility of funding to prevent homelessness and support Rapid Rehousing for individuals and families.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;&lt;div&gt;ESG-CV 1 and ESG-CV 2:Grant funding may be provided to non-profit organizations to respond to, prevent the spread of, and prepare for the effects of COVID-19 within the full range of eligible ESG activities . The State of West Virginia may directly administer ESG CV funding. Funding will be released in separate allocations to adequately respond to COVID-19 in connecting homeless individuals and households to housing and resources while also keeping those at-risk of homeless in housing. Any remaining funds not allocated during the first allocations to respond to COVID-19 during year one of funding will be reserved for response during year two of these ESG-CV initial allocations by HUD. HMIS/DV database projects will be eligible.&lt;/div&gt;</p>
6	<b>Goal Name</b>	Provide Suitable Living Environment HOPWA
	<b>Goal Description</b>	HOPWA program funds will be used to provide operations, short term rent assistance, mortgage assistance, utility assistance, tenant-based rental assistance, permanent housing placement and supportive services to low-income individuals with HIV/AIDS and their families.

7	<b>Goal Name</b>	Increase the supply of affordable housing
	<b>Goal Description</b>	<p>The State of West Virginia was awarded \$149,875,000 in CDBG-DR funds due to the flooding in June 2016.</p> <p>The budget is as follows:</p> <ul style="list-style-type: none"> <li>● Housing Restoration Program - \$64,378,950</li> <li>● Rental Assistance Program - \$16,000,000</li> <li>● Hazard Mitigation Grant Program Match - \$12,440,000</li> <li>● Bridge HOME Program - \$2,080,000</li> <li>● Restore Riverview Project - \$5,712,000</li> <li>● Slum and Blight Removal Program - \$5,875,000</li> <li>● Multifamily Rental Housing Program - \$5,875,000</li> <li>● Economic Development Program - \$20,020,300</li> <li>● Planning - \$10,000,000</li> <li>● State Administration - \$7,493,750</li> <li>● The CDBG-DR Plan may be viewed at <a href="http://wvfloodrecovery.com/useful-resources/">http://wvfloodrecovery.com/useful-resources/</a> .</li> </ul>
8	<b>Goal Name</b>	Local Community Development
	<b>Goal Description</b>	<p>2019 AAP Update for CDBG-CV1, CDBG-CV2 and CDBG-CV3 funds for public facility, public service activities, and planning activities. Public Service Categories include: Homeless/AIDS Patients Programs, Senior Services, Services for Persons with Disabilities, Legal Services, Youth Services, Transportation Services, Substance Abuse Services, Services for victims of domestic violence, Employment Training, Crime Awareness/Prevention, Fair Housing, Tenant/Landlord Counseling, Child Care Services, Health Services, Services for Abused and Neglected Children, Mental Health Service, Subsistence Payments, Security Deposits, Food Banks.</p>



## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The table assigns a percentage for each State HUD Funded Program under each goal. These funds are expected to be made available to address the housing-related needs and non-housing community development needs described in the strategies, priority needs, and objectives section of the Consolidated Plan.

### Funding Allocation Priorities

	Development of Public Infrastructure (%)	Increase affordable, accessible housing (%)	Job creation and retention (%)	ESG Shelter Goal 2 (%)	ESG ReHousing and Prevention Goal 1 (%)	Provide Suitable Living Environment HOPWA (%)	Increase the supply of affordable housing (%)	Local Community Development (%)	Total (%)
CDBG	100	0	0	0	0	0	0	0	100
HOME	0	0	0	0	0	0	100	0	100
HOPWA	0	0	0	0	0	100	0	0	100
ESG	0	0	0	40	60	0	0	0	100
HTF	0	0	0	0	0	0	0	0	0
Housing Trust Fund	0	0	0	0	0	0	100	0	100

Other CDBG-CV	62	0	0	0	0	0	0	38	100
Other ESG-CV	0	0	0	30	70	0	0	0	100
Other HOPWA-CV	0	0	0	0	0	100	0	0	100

**Table 3 – Funding Allocation Priorities**

### Reason for Allocation Priorities

The allocation priorities are based upon needs identified through the citizen participation and consultation process. Funding levels are established to support the goals identified in the Consolidated Plan. **CDBG**: Development of public infrastructure continues to be the priority. Realizing that reliable infrastructure forms the foundation for other opportunities, the State will invest 100 percent of the CDBG funding to develop suitable living conditions and create an environment conducive to future community and economic development. Recognizing the need to narrow the digital divide in low- and moderate-income communities, West Virginia will provide resources to further the development of broadband infrastructure by dedicating a portion of its FY 2019 CDBG allocation to broadband development. The State recognizes that enabling the connectivity of its communities empowers residents with resources, such as job training, education, and economic opportunity, particularly among vulnerable populations. The WVDO will coordinate projects with the West Virginia Broadband Enhancement Council and the West Virginia Geological and Economic Survey, Office of GIS Coordination. Initial applications will be due September 30, 2019. A second funding cycle may be added in Spring 2020, upon notification to local governments and other stakeholders. The use of CDBG funding for this purpose will enable the State to: A) Assist planning, analysis, and assessment activities that further the strategic deployment of broadband across the State B) Make investments that leverage other federal, state, and local funding in the deployment of broadband infrastructure. C) Provide funding for broadband pilot and demonstration projects that provide for the innovative deployment and installment of broadband facilities and infrastructure. **HOME**: The \$4,729,494 will be allocated to the State and estimated \$2,000,000 of 2019 Program Income are allocated 100% to increasing the supply of affordable housing. **HTF**: The 2019 \$3,000,000 and estimated \$10 Program Income are allocated 100% to increasing the supply of affordable housing. **ESG**: Allocates ESG funds through a competitive application process. Eligible applicants include UGLG and

nonprofits. Priority is given to those applicants not serving entitlement areas. By allocating through a competitive process, subrecipients determine needs that are supported through community needs assessments in coordination with their CoC's. Most recipients identify rapid rehousing as a priority need in their service area. The WVDO places a focus on rapid rehousing and prevention programs as a critical piece in ending homelessness for those clients who receive the services. **HOPWA:** Allocates HOPWA funds annually through a competitive application process. Eligible applicants include nonprofit organizations. Through this process, the WVDO ensures that funds are allocated to applicants that: Clearly state the need for the services in their area and provide data to support the need. Provide housing assistance and appropriate support services to enable low-income individuals with HIV/AIDS to remain in their homes and to reduce their risks of homelessness. Improve access to health care and other supportive services for individuals with HIV/AIDS. **ESG CV-1 and ESG CV-2:** Funds have been allocated reflecting the current needs regarding COVID-19 within our State including HP - Rental Assistance and congregate/non-congregate shelter options as priorities. Since much is unknown about how this situation will progress in the long-term, funding allocations may be adjusted in response to this ever-changing situation. Eligible applicants include local units of government, nonprofits and PHAs. Priority is given to those applicants not serving entitlement areas. **CDBG-CV1, CDBG-CV2, and CDBG-CV3** funds will be allocated to public facilities and public services.

**How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**

CDBG: Because the annual demand for funding far exceeds the amount of funding available on an annual basis, it is not uncommon to receive the same water and wastewater infrastructure project applications for several consecutive years. Most infrastructure projects address serious health or environmental concerns in eligible areas. Each investment of CDBG funding improves this situation; however, many residents continue to struggle with inadequate and/or unsafe water and wastewater systems. This is particularly a hardship in low- and moderate-income areas in which residents don't have available resources needed to adequately support infrastructure investment. Because the development of water and wastewater systems continues to be a critical need, a majority of CDBG funding is used for this purpose.

The State proposes to support the development of broadband infrastructure through the dedication of a portion from its annual allocation. Broadband development is categorized as Technology and Innovation for infrastructure development and planning. The State developed this program through a Substantial Amendment to the FY 2017 Action Plan. Public comments at that time detailed the lack of broadband internet and its implications regarding business development, tourism, education, as well as the correlating negative impact on economic opportunities



for vulnerable populations.

ESG and HOPWA: By using a competitive application process, the WVDO assures the funds are used to continue serving those most at need. The overall goal of the ESG program is to end homelessness. By streamlining resources in such a way to serve those hardest to serve, chronically homeless individuals and families, and quickly stabilizing their housing, these goals can be met. Shelters are funded with the understanding that the maximum shelter stay for their residents be no more than 30 days. This is not used as a way to move clients back onto the streets but rather quickly rehouse them.

HOME: In order to increase the supply of affordable housing in the State, HOME employs several programs. HOME Leverage Loan aids qualified homebuyers in the purchase of houses. HOME Rental and CHDO aid developers in the new construction and rehabilitation of residential rental units. CHDO Operating Expense Grant provides funds for certified CHDOs so that a portion of a CHDO's operating expenses can be reimbursed. Each commitment of HOME funds increases the supply of safe, decent, sanitary, and affordable housing in the State.

HTF: In order to increase the supply of affordable housing in the State, HTF funds will be used to aid developers in the new construction and rehabilitation of multifamily residential rental units.

## AP-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

The methods of distribution identify the process each State HUD-funded program will follow to distribute funds. The CDBG funds development of communities within the State's strategy is based upon the consolidated plan, and the identification of local priorities for investments that are consistent with the objectives of the program. The method of distribution is designed to permit flexibility in the utilization of other sources of funding and timing of investment decisions.

In 2016, HUD directed that States evaluate the availability of broadband access through its rule entitled, "Modernizing the HUD Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Disasters." As communities and economies become more connected, broadband infrastructure is an increasing concern, particularly among rural areas of West Virginia and areas in which low- and moderate-income individuals do not have access to this technology. To support this initiative, and to assess the availability of broadband in West Virginia, the State will dedicate funds to support planning for broadband development and broadband infrastructure projects.

A proposed 2019 CDBG program budget is provided with this document. The State will adjust allocation amounts as necessary within each category to align with demonstrated needs and to ensure that all CDBG funding is allocated in an efficient and effective manner. Funds more than demonstrated needs at the end of each CDBG funding cycle, and/or recaptured funds, will be returned to an available status and may be used to fund applications in eligible categories.

HUD's April 10, 2020, memorandum outline the availability of waivers and suspensions of the HOME Program requirements in response to COVID-19 pandemic. On May 21, 2020, WVHDF requested waivers/suspensions that will permit maximum administrative flexibility to better assist low- and very-low income households as they deal with the effect of the COVID-19 pandemic. HUD approval was granted on May 22, 2020.

### Distribution Methods

Table 4 - Distribution Methods by State Program

1	State Program Name:	CDBG
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	<b>Funding Sources:</b>	CDBG
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<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>An activity may be funded in whole or in part with CDBG funds only if all the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. Each activity must be eligible under Section 105 of the Act as summarized in 24 CFR 570: Title 24 - Housing and Urban Development, Part 570 Community Development Block Grants.</li> <li>2. Each activity must fulfill one of the three national objectives.</li> <li>3. Each activity must meet environmental review and clearance procedures. A notice of the CDBG grant application period is provided, on an annual basis, to all units of local government and the State's 11 Regional Planning and Development Councils. All application guidelines and documents are posted to the WVDO website and provided upon request.</li> </ol> <p>All units of local government in non-entitlement areas of the State may apply for CDBG funding. All applications determined to be eligible and to meet a national objective shall advance and be reviewed for funding. The purpose of the review is to screen applications for competitiveness in relation to the amount of funds available. To the extent applicable, criteria to be considered during the review will include:</p> <ol style="list-style-type: none"> <li>1. The relationship to a national objective and number of low- and moderate-income persons served.</li> <li>2. The relationship to CDBG program design objectives.</li> <li>3. The public health, environmental, and economic development benefits of the project.</li> <li>4. The degree to which the project will correct identified deficiencies or achieve compliance with required standards.</li> <li>5. The cost effectiveness of the project.</li> <li>6. The availability of other sources of funding for the project.</li> <li>7. The degree to which the project achieves state, regional, and local planning goals,</li> <li>8. The readiness of the project to proceed, if funded, and</li> </ol>
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		<p>9. Other CDBG considerations, such as existing open grants, other requests from the same area, applicant's capacity to administer and operate the project and grant, if approved, fair housing initiatives proposed, impact upon minority areas, and the geographical distribution of funds.</p> <p>The addition of funding categories for Broadband Community Development, including program guidelines for planning and infrastructure projects; are detailed in complete Program Design document which is included as an attachment to this Annual Action Plan.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>In addition to the criteria stated in the Method of Distribution, the following criteria will be emphasized during the review process: 1). Existing open grants that are not proceeding according to the timeframe established in the grant agreement; 2). Readiness of the project to proceed; and 3). Commitment of all other funding sources. For example, an application for a project from a community that has no threshold restrictions, is fully funded, and has completed all design work necessary to proceed to construction will receive priority consideration for funding if the project meets all other review criteria.</p> <p><b><u>Coordination and Review by the Infrastructure and Jobs Development Council (IJDC) for Water, Wastewater, and Economic Development:</u></b> The WVDO will conduct a technical evaluation and review to include consultation with local, regional, state, and federal agencies, including those of the IJDC, to assess and clarify statements of community development and housing needs and needs of low- and moderate-income persons; assess performance in meeting citizen participation requirements; determine project eligibility in accordance with Section 105 of the Act; determine relationship to one or more of the three national objectives in accordance with 24 CFR Part 570.483; and verify consistency of the application to the recommendation of the IJDC, if applicable. Applications deemed not eligible or not to fulfill a national objective shall be removed from consideration and the applicant so notified. No action shall be taken inconsistent with the recommendations of the IJDC. The WVDO reserves the right to petition the IJDC for reconsideration of any decision that runs counter to the provisions of 24 CFR Part 570 and/or any HUD policy or regulation regarding program eligibility.</p> <p><b><u>Coordination with and Review by the West Virginia Broadband Enhancement Council (WVBEC) for Broadband Projects:</u></b> The WVDO will conduct a technical evaluation to include consultation with local, regional, state, and federal agencies, including those of the WVBEC and the Office of GIS Coordination. The review is to assess and clarify statements of community development needs and needs of low- and moderate-income persons as well as low- and moderate-income areas; assess applicant's performance in meeting citizen participation requirements; determine eligibility in accordance with Section 105 of the Act; determine relationship to one or more of the three national objectives in accordance with 24 CFR Part 570.483; and verify consistency of the application to the recommendation of the WVBEC, if applicable. Applications deemed not eligible or not to fulfill a national objective shall be removed from consideration and the applicant so notified. No action shall be taken inconsistent with the recommendations of the WVBEC. The WVDO reserves the right to petition the WVBEC for</p>
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	<p>reconsideration of any decision that runs counter to the provisions of 24 CFR Part 570 and/or any HUD policy or regulation regarding program eligibility.Â</p> <p>Â</p> <p>Â</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The current CDBG application and instruction formsÂ are available onÂ the WVDOÂ website.Â The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicableÂ federal and state regulations, and details regarding the CDBG program design.Â Recipients may also contact the office forÂ aÂ copy. The WVDO also provides a Policies and Procedures Manual, the purpose of which is:</p> <ul style="list-style-type: none"> <li>• To assist grant recipients in the administration of CDBG projects;</li> <li>• To provide practical informationÂ concerning legal, financial and program requirements; and</li> <li>• ToÂ establish aÂ comprehensive approach to grant approval, documentation, implementation, project management, audit and closeout of CDBG projects.</li> </ul> <p>The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. Though not all inclusive, the manual covers the major areas of CDBG administration, provides required and suggested forms and instructions, and provides references for applicable laws and regulations. The manual was updated in 2015 and will be used in several different program years. As new federal or state requirements are implemented, the WVDO may issue supplemental policy notifications.Â In all cases, the current and applicable federal or state regulation will apply.</p> <p>Â For project and activity eligibility and program updates, the current program year CDBG Program Description and Application Guidelines should be consulted. Revisions and/or additions to this manual will be updated and made available on the (WVDO) website at <a href="http://www.wvcad.org/">http://www.wvcad.org/</a>.</p>

<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not applicable.</p>
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<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	Not applicable.
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<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Application categories, ceilings and deadlines are provided for each of the following eligible uses of CDBG funding:</p> <ol style="list-style-type: none"> <li>1. <u>Water and Wastewater Projects:</u> Applications must be postmarked by August 30, 2019. No application for water or wastewater may be submitted without an IJDC determination letter. An IJDC Technical Review letter must be submitted to WVDO with an applicant's project application to be considered for 2019 funding. The Director reserves the right to partially fund a project. Projects may be selected for a Design and Administration award of up to \$200,000, not to exceed 80 percent of total design costs.</li> <li>2. <u>Community Development Projects; such as Planning Projects and General Community Development:</u> Applications must be postmarked by August 30, 2019. Planning Projects shall be limited to \$100,000, with a 10 percent local cash match. Joint planning projects shall be limited to \$120,000 regardless of the number of jurisdictions in the joint application, with a 10 percent local cash match. General Community Development Projects include eligible projects other than water, wastewater, or job creation/retention. This category may include land development or revolving loan fund proposals. The Director reserves the right to partially fund a project.</li> <li>3. <u>Job Creation Projects:</u> Applications must be postmarked by October 30, 2019. Funds granted to Job Creation Projects are subject to the public benefit standards established by HUD. No more than \$35,000 per net new job may be awarded. For Development Projects (Water, Wastewater, Site Development), the limit per project is \$1,250,000.</li> <li>4. <u>Technology and Innovation-Broadband:</u> The State dedicated a portion of its CDBG allocation towards broadband development in one or more funding cycles with the first application deadline of September 30, 2019. Additional funding cycles may be added in Spring 2020, upon notification to local governments and other stakeholders. Infrastructure projects are limited to \$1,250,000. Planning grants shall be limited to a range of \$30,000 to \$50,000 per municipality; \$50,000 to \$75,000 per county; and \$75,000 to \$125,000 per regional applicant. Pilot and/or Demonstration projects shall be limited to \$500,000. Matching funds are not required. The Director reserves the right to partially fund a project.</li> </ol>
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<p><b>Describe threshold factors and grant size limits.</b></p>	<p><u>Threshold Requirements--Performance Standards:</u> The following jurisdictions may not apply for funds unless a waiver is obtained. (1) Jurisdictions having active grants from the FY 2015 or earlier program years that have not received an interim closeout. (2) Jurisdictions having active grants from the FY 2016 program year that have not initiated sufficient construction activity to bring the project to completion until activity is at least 75 percent complete. (3) Jurisdictions holding a FY 2019 "Letter of Intent" may not apply for funds for another project in the same category. For example, if the jurisdiction has a Letter of Intent for a water/wastewater project, they can still apply for a general community development, planning, and economic development project IF they meet the above threshold requirements. A waiver request may be submitted; however, significant progress must have been made on the project holding the Letter of Intent. This will be an extremely difficult waiver to obtain.</p> <p><u>Threshold Requirements--Recapture Schedule:</u> In addition to the above standards that prohibit the application of CDBG funds for the FY 2019 program, be advised that letters will be mailed in September 2019 indicating that projects funded in FY 2015 or earlier that have not entered into construction contracts by December 31, 2019, may have all funds recaptured as of January 15, 2020.</p> <p><u>Grant size limits:</u> Infrastructure: Water and Wastewater projects are capped at \$1,500,000; Economic Development- Job Creation projects are capped at \$1,250,000; General Community Development projects are capped at \$500,000; Planning Projects are capped at \$100,000 or \$120,000 for a Joint Planning Project; Technology and Innovation-Broadband Planning projects must range between \$30,000 to \$125,000; Broadband Infrastructure projects are capped at \$1,250,000; and Pilot and/or Demonstration projects are capped at \$500,000. In all categories, the Director reserves the right to partially fund a project. The Director of the Community Development Division will consider requests for a waiver of the above thresholds if the applicant can show that the circumstances surrounding the failure to meet the performance standard were due to circumstances beyond the control of the applicant. If a waiver is granted, the applicant must commit to a strategy to resolve the problem, against which future performance will be measured. Failure to meet this performance standard and subsequent closeout of the project will prohibit future waivers from being considered job creation or retention excepted. In any case, the Director may grant a waiver for a job creation or retention</p>
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		project if the problematic project was based upon job creation or retention, the directorÂ agrees that adequate efforts are being made and as a result of those efforts it is reasonable to assume that jobs will be created, a waiver may be granted.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	<p>The State shall amend its action plan if the method of distribution contained in the action plan submitted to HUD is to be changed. The State shall determine the necessary changes; prepare the proposed amendment; provide citizens and units of general local government with reasonable notice of, and an opportunity to comment on, the proposed amendment; consider comments received; make the action plan available to the public at the time it is submitted to HUD; and submit the amended action plan to HUD before the state may implement changes embodied in the amendment.</p> <p>The method of distribution will support the Stateâs goals as outlined previously.Â The State expects to support local government efforts to provide affordable infrastructure systems to strengthen the foundations for economic growth and alleviate conditions that affect environmental quality, public health or welfare. This is estimated to affect a total of 5,972 LMI individuals.</p>
<b>2</b>	<b>State Program Name:</b>	CDBG-CV1
	<b>Funding Sources:</b>	CDBG-CV

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>CDBG-CV1 funds will be awarded on a competitive basis through an open application process at least biannually. The State may directly administer funds as needed.</p> <p>An activity may be funded in whole or in part with CDBG funds only if all the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. All non-Entitlements of local government in the State of may apply for CDBG-CV1 funding. The State may directly administer funds as needed up to \$10,000,000 in CDBG-CV funds.</li> <li>2. Each activity must be eligible under Section 105 of the Act as summarized in 24 CFR 570: Title 24 - Housing and Urban Development, Part 570 Community Development Block Grants.</li> <li>3. Each activity must fulfill one of the three national objectives.</li> <li>4. Documentable connection between the coronavirus impact on client needs as a result of COVID-19 pandemic and the applicant's service delivery.</li> <li>5. Each activity must meet environmental review and clearance procedures.</li> <li>6. Number of low- and moderate-income persons served. Must serve at least 51% or more low to moderate income persons. This can be Low to moderate income area (LMA), survey must be conducted of the service area to document project service area as 80% or below of area median income, or Low to moderate income clientele (LMC) at least 51% of the beneficiaries of the project must be LMI defined as 80% or below of area median income.</li> <li>7. The relationship to CDBG program design objectives.</li> </ol>
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		<p>8. The level of documented need in the project area.</p> <p>9. The readiness of the project to proceed, if funded, and</p> <p>10. Other CDBG considerations, applicant's capacity to administer and operate the project and grant, if approved, fair housing initiatives, impact upon minority areas, and the geographical distribution of funds will be reviewed.</p> <p>11. Duplication of benefits- Applicants will be required to complete DOB documentation at application and will be required to continue to report on DOBs throughout the expenditure period for the CDBG-CV1 funds.</p> <p>A Duplication of Benefits (DOB) occurs when a program beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular funding need. The amount of the duplication is the amount of assistance provided in excess of the need. It is the Department's responsibility to ensure that each CDBG-CV1 Activity provides assistance only to the extent that the project's funding needs have not been met by another source. See the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) (42 U.S.C. § 5155; HUD Memorandum dated 9 April 2020, subject: 'CARES Act Flexibilities for CDBG funds used to support coronavirus response and plan amendment waiver'). Section 312 of the Stafford Act prohibits federal agencies from providing assistance to any "person, business concern, or other entity" for any loss to which the entity has already received financial assistance from another source (42 USC § 5155(a)). The Federal Register Notice, published November 16, 2011 (Docket No. FR-5582-N), requires adequate policies and procedures in place to prevent a DOB and the recapture of funds, if necessary.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>In addition to the criteria stated in the Method of Distribution, the following criteria will be emphasized during the review process: 1) Tie back to COVID-19 effect and 2). No Duplication of Benefits 3) Readiness of the project to proceed; 4) priority given to projects have greatest benefit to low to moderate income persons. The current CDBG application and instruction forms are available at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicable federal and state regulations, and details regarding the CDBG program design. Recipients may also contact the office for a copy. The WVDO also provides a Policies and Procedures Manual on the (WVDO) website at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. In all cases, the current and applicable federal or state regulation will apply.</p>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The CDBG-CV1 application and instruction forms will be available at <a href="https://wvcad.org/resources">https://wvcad.org/resources</a>. The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicable federal and state regulations, and details regarding the CDBG program design. Recipients may also contact the office for a copy. The WVDO also provides a Policies and Procedures Manual, the purpose of which is: assist grant recipients in the administration of CDBG-CV1 projects; To provide practical information concerning legal, financial and program requirements; and to establish a comprehensive approach to grant approval, documentation, implementation, project management, audit and closeout of CDBG projects. The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. Though not all inclusive, the manual covers the major areas of CDBG administration, provides required and suggested forms and instructions, and provides references for applicable laws and regulations. The manual was updated in 2015 and will be used in several different program years. As new federal or state requirements are implemented, the WVDO may issue supplemental policy notifications. In all cases, the current and applicable federal or state regulation will apply for project and activity eligibility and program updates, the CDBG-CV1 Program Description and Application Guidelines should be consulted. Revisions and/or additions to this manual will be updated and made available on the (WVDO) website at <a href="http://wvcad.org/resources">http://wvcad.org/resources</a>.</p>
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not Applicable.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not Applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	

	<b>Describe threshold factors and grant size limits.</b>	
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	<b>What are the outcome measures expected as a result of the method of distribution?</b>	
<b>3</b>	<b>State Program Name:</b>	CDBG-CV2
	<b>Funding Sources:</b>	CDBG-CV

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>CDBG-CV2 funds will be awarded on a competitive basis through an open application process at least biannually. The State may directly administer funds as needed up to \$10,000,000 in CDBG-CV funding.</p> <p>An activity may be funded in whole or in part with CDBG funds only if all the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. All units of local government, including Entitlement Communities, in the State of West Virginia may apply for CDBG-CV2 funding. The State may directly administer funds as needed.</li> <li>2. Each activity must be eligible under Section 105 of the Act as summarized in 24 CFR 570: Title 24 - Housing and Urban Development, Part 570 Community Development Block Grants.</li> <li>3. Each activity must fulfill one of the three national objectives.</li> <li>4. Documentable connection between the coronavirus impact on client needs as a result of COVID-19 pandemic and the applicant's service delivery.</li> <li>5. Each activity must meet environmental review and clearance procedures.</li> <li>6. Number of low- and moderate-income persons served. Must serve at least 51% or more low to moderate income persons. This can be Low to moderate income area (LMA), survey must be conducted of the service area to document project service area as 80% or below of area median income, or Low to moderate income clientele (LMC) at least 51% of the beneficiaries of the project must be LMI defined as 80% or below of area median income.</li> <li>7. The relationship to CDBG program design objectives.</li> <li>8. The level of documented need in the project area.</li> <li>9. The readiness of the project to proceed, if funded, and</li> <li>10. Other CDBG considerations, applicant's capacity to administer and operate the project and grant, if approved, fair housing initiatives, impact upon minority areas, and the geographical distribution of funds will be reviewed.</li> <li>11. Duplication of benefits- Applicants will be required to complete DOB documentation at application and will be required to continue to report on DOBs throughout the expenditure period for the CDBG-CV2 funds.</li> </ol> <p>A Duplication of Benefits (DOB) occurs when a program beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular funding need. The amount of the duplication is the amount of assistance provided in excess of the need. It is the Department's responsibility to ensure that each CDBG-CV2 Activity provides assistance only to the extent that the project's funding needs have not been met by another source. See the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) (42 U.S.C. § 5155; HUD Memorandum dated 9 April 2020, subject: 'CARES Act Flexibilities for CDBG funds used to support coronavirus response and plan amendment waiver'). Section 312 of the Stafford Act prohibits federal agencies from providing assistance to any "person, business concern, or other entity"</p>
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	<p>for any loss to which the entity has already received financial assistance from another source (42 USC § 5155(a)). The Federal Register Notice, published November 16, 2011 (Docket No. FR-5582-N), requires adequate policies and procedures in place to prevent a DOB and the recapture of funds, if necessary.&lt;/div&gt;</p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>In addition to the criteria stated in the Method of Distribution, the following criteria will be emphasized during the review process: 1) Tie back to COVID-19 pandemic and 2). No Duplication of Benefits 3) Readiness of the project to proceed; 4) priority given to projects that have greatest benefit to low to moderate income persons or demonstrate significant need that will be addressed by the project activities. The current CDBG application and instruction forms are available at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicable federal and state regulations, and details regarding the CDBG program design. Recipients may also contact the office for a copy. The WVDO also provides a Policies and Procedures Manual on the (WVDO) website at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. In all cases, the current and applicable federal or state regulation will apply.</p>

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The CDBG-CV2 application and instruction forms will be available online at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicable federal and state regulations, and details regarding the CDBG program design. Recipients may also contact the office for a copy. The WVDO also provides a Policies and Procedures Manual, the purpose of which is: To assist grant recipients in the administration of CDBG-CV2 projects; To provide practical information concerning legal, financial and program requirements; and To establish a comprehensive approach to grant approval, documentation, implementation, project management, audit and closeout of CDB-CV2 projects. The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. Though not all inclusive, the manual covers the major areas of CDBG administration, provides required and suggested forms and instructions, and provides references for applicable laws and regulations. The manual was updated in 2015 and will be used in several different program years. As new federal or state requirements are implemented, the WVDO may issue supplemental policy notifications. In all cases, the current and applicable federal or state regulation will apply. For project and activity eligibility and program updates, the CDBG-CV2 Program Description and Application Guidelines should be consulted. Revisions and/or additions to this manual will be updated and made available on the (WVDO) website at <a href="http://www.wvcad.org/">http://www.wvcad.org/</a>.</p>
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not Applicable.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not Applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	

	<b>Describe threshold factors and grant size limits.</b>	
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	
4	<p><b>State Program Name:</b></p>	CDBG-CV3
	<p><b>Funding Sources:</b></p>	CDBG-CV

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>CDBG-CV3 funds will be awarded on a competitive basis through an open application process at least biannually. The State may directly administer funds as needed up to \$10,000,000 in CDBG-CV funding.</p> <p>An activity may be funded in whole or in part with CDBG funds only if all the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. All units of local government, including entitlement communities, in the State of West Virginia may apply for CDBG-CV3 funding. The State may directly administer funds as needed.</li> <li>2. Each activity must be eligible under Section 105 of the Act as summarized in 24 CFR 570: Title 24 - Housing and Urban Development, Part 570 Community Development Block Grants.</li> <li>3. Each activity must fulfill one of the three national objectives.</li> <li>4. Documentable connection between the coronavirus impact on client needs as a result of COVID-19 pandemic and the applicant's service delivery.</li> <li>5. Each activity must meet environmental review and clearance procedures.</li> <li>6. Number of low- and moderate-income persons served. Must serve at least 51% or more low to moderate income persons. This can be Low to moderate income area (LMA), survey must be conducted of the service area to document project service area as 80% or below of area median income, or Low to moderate income clientele (LMC) at least 51% of the beneficiaries of the project must be LMI defined as 80% or below of area median income.</li> <li>7. The relationship to CDBG program design objectives.</li> <li>8. The level of documented need in the project area.</li> <li>9. The readiness of the project to proceed, if funded, and</li> <li>10. Other CDBG considerations, applicant's capacity to administer and operate the project and grant, if approved, fair housing initiatives, impact upon minority areas, and the geographical distribution of funds will be reviewed.</li> <li>11. Duplication of benefits- Applicants will be required to complete DOB documentation at application and will be required to continue to report on DOBs throughout the expenditure period for the CDBG-CV3 funds.</li> </ol> <p>A Duplication of Benefits (DOB) occurs when a program beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular funding need. The amount of the duplication is the amount of assistance provided in excess of the need. It is the Department's responsibility to ensure that each CDBG-CV3 Activity provides assistance only to the extent that the project's funding needs have not been met by another source. See the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) (42 U.S.C. § 5155; HUD Memorandum dated 9 April 2020, subject: 'CARES Act Flexibilities for CDBG funds used to support coronavirus response and plan amendment waiver'). Section 312 of the Stafford Act prohibits federal agencies from providing assistance to any "person, business concern, or other entity"</p>
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	<p>for any loss to which the entity has already received financial assistance from another source (42 USC § 5155(a)). The Federal Register Notice, published November 16, 2011 (Docket No. FR-5582-N), requires adequate policies and procedures in place to prevent a DOB and the recapture of funds, if necessary.</p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>In addition to the criteria stated in the Method of Distribution, the following criteria will be emphasized during the review process: 1) Tie back to COVID-19 pandemic and 2). No Duplication of Benefits 3) Readiness of the project to proceed; 4) priority given to projects have greatest benefit to low to moderate income persons or demonstrate significant that will be addressed by the project activities. The current CDBG application and instruction forms are available at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicable federal and state regulations, and details regarding the CDBG program design. Recipients may also contact the office for a copy. The WVDO also provides a Policies and Procedures Manual on the (WVDO) website at <a href="http://www.wvcad.org/resources">http://www.wvcad.org/resources</a>. The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. In all cases, the current and applicable federal or state regulation will apply.</p>

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>The CDBG-CV3 application and instruction forms will be available online at <a href="https://wvcad.org/resources">https://wvcad.org/resources</a>. The application and instruction forms provide a comprehensive review of program requirements, application procedures, criteria for eligibility, applicable federal and state regulations, and details regarding the CDBG program design. Recipients may also contact the office for a copy. The WVDO also provides a Policies and Procedures Manual, the purpose of which is: assist grant recipients in the administration of CDBG-CV3 projects; To provide practical information concerning legal, financial and program requirements; and to establish a comprehensive approach to grant approval, documentation, implementation, project management, audit and closeout of CDBG projects. The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations. Though not all inclusive, the manual covers the major areas of CDBG administration, provides required and suggested forms and instructions, and provides references for applicable laws and regulations. The manual was updated in 2015 and will be used in several different program years. As new federal or state requirements are implemented, the WVDO may issue supplemental policy notifications. In all cases, the current and applicable federal or state regulation will apply for project and activity eligibility and program updates, the CDBG-CV3 Program Description and Application Guidelines should be consulted. Revisions and/or additions to this manual will be updated and made available on the (WVDO) website at <a href="https://www.wvcad.org/resources">https://www.wvcad.org/resources</a>.</p>
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not Applicable.</p>
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<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	Not Applicable.
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<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Public Facilities</p> <p>Construct or rehabilitate a facility for testing, diagnosis, or treatment due to the COVID-19 outbreak</p> <p>Rehabilitate a commercial building or closed school building to establish an infectious disease treatment clinic, e.g., by replacing the HVAC system</p> <p>Acquire, and quickly rehabilitate (if necessary) a motel or hotel building to expand capacity of hospitals to accommodate isolation of patients during recovery</p> <p>Public Schools may be considered a public facility and eligible for CDBG-CV funding so long as the activity is eligible for CDBG-CV funding and clearly ties back to the Covid-19 Pandemic.</p> <p>Provision of New or Quantifiably Increased Public Services</p> <p>Service Delivery Costs-General service delivery cost can include salary and benefits, supplies, overhead (utilities), transportation/mileage providing the activities listed as follows:</p> <p>Provide testing, diagnosis or other services at a fixed or mobile location.</p> <p>Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities</p> <p>Support operations of food banks and food pantries including staff costs, supplies, utilities, maintenance, sanitary maintenance, and insurance</p> <p>Support feeding programs to vulnerable populations such as seniors, children, and youth affected by the COVID-19 outbreak</p> <p>Provide emergency payments (no more than six months) on behalf of individuals and families to prevent homelessness, including utility payments to prevent cutoff of service and rent/mortgage payments to prevent eviction.</p> <p>Additional eligible public service activities include:</p> <p>Public Service Categories include: Homeless/AIDS Patients Programs, Senior Services, Services for Persons with Disabilities, Legal Services, Youth Services, Transportation Services, Substance Abuse Services, Services for victims of domestic violence, Employment Training, Crime Awareness/Prevention, Fair Housing, Tenant/Landlord Counseling, Child Care Services, Health Services, Services for Abused and Neglected Children, Mental Health Service, Subsistence Payments, Security Deposits, Food Banks.</p> <p>Planning Grants and Planning Only Grants</p> <p>Grant funds to units of general local government may be used for planning activities in conjunction with an activity, they may also be used for planning only as an activity. These activities must meet or demonstrate that they would meet a national objective. These activities are subject to the State's 20 percent administration, planning and technical assistance cap.</p> <p>Grant funds to units of general local government to hire technical assistance providers to deliver CDBG training to new subrecipients and local government departments that are administering CDBG funds for the first time to assist with infectious disease response. This activity is subject to the State's 5 percent administration and 2% technical</p>
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		<p>assistance cap</p> <p>The following are NON-ELIGIBLE under the CDBG-CV3 funding:</p> <ul style="list-style-type: none"> <li>Political activities</li> <li>General government activities</li> <li>Direct cash payment to clients (beneficiaries)</li> </ul> <p>WVDO reserves the right to adjust the allocations between the categories above based upon the actual number of applications received, amounts requested by applicants, and the readiness to proceed of the applications that are submitted.</p>
	<p><b>Describe threshold factors and grant size limits.</b></p>	

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	<div>Public Infrastructure (public facilities): 4,000 households served</div><div>Local Community Development (public services): 4,000 households served</div>
5	<b>State Program Name:</b>	ESG
	<b>Funding Sources:</b>	ESG

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The WVDO administers the ESG program in West Virginia as a grantee of HUD, and in compliance with the HEARTH Act and other federal requirements. To facilitate strategic, community-wide policies, direct services and coordination with other resources that may be available to individuals and families that are experiencing homelessness, the HEARTH Act mandates area-wide systems coordination including: Consultation with Continuums of Care; Coordination with other programs targeted to people experiencing homelessness; Systems and program coordination with mainstream resources (health, employment, education etc.); Centralized or coordinated assessment; Written standards for providing ESG assistance; and Participation in HMIS, or in the case of victim service providers, a comparable system. WVDO allocates ESG funds through a competitive application process.</p> <p>As a threshold consideration, all applicants must demonstrate how their housing or service projects directly serve persons who are homeless as defined by HUD and demonstrate how the housing and services provided will improve housing stability for those persons. Applicants must describe homeless verification methods, and how they will track outputs and outcomes (stable housing) for persons served. Both HUD-funded and State Housing Trust Fund for the Homeless (HTF)-funded ESG funds are available to nonprofit organizations (including community and faith-based organizations) and local government entities. Agencies must demonstrate collaboration with local mainstream service providers and local provider groups that are dedicated to housing and service interventions that serve persons experiencing homelessness. Agencies must also participate in HUD-mandated continuum of care planning appropriate to the jurisdiction where their activities are located.</p> <p>Funding decisions will be based on a number of factors, including but not limited to, population to be served; the eligibility of described activities; minimum criteria for organizational capacity, community or service area need; past or projected project performance; responsiveness to timeliness and information requested; and HMIS performance.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>All applications must be submitted before the deadline to be considered for review. Any application received after the deadline will not be reviewed. If all applicable sections of the application are not completed, the application will not be scored. All applications that meet the standards outlined in 1 and 2 above will be scored and evaluated by a review team comprised of WVDO staff. Each question in the narrative is worth 10 total points and will be scored by component. Each appendix is worth 5 points. Budget/Outcome forms are worth 50 points each. One point will be given to all applicants from non-entitlement areas in accordance with the WV consolidated plan. Points may be deducted for compliance issues for applicants who have had the grant in the previous years.</p>
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<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not applicable.
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>The WVDO receives the ESG allocation directly through the US Department of Housing and Urban Development from annual awards. HUD will notify each ESG-eligible State, metropolitan city, urban county, and territory of the amount of its allocation.</p> <p>The State prepares a competitive grant application that is distributed to all interested parties, CoCs and currently funded ESG recipients, and posted on the WVDO website.Â Training and technical assistance calls are held to guide potential applicants through the application process.Â At the end of the application period, all complete eligible applications are reviewed by a team of WVDO staff and a risk assessment is performed for each applicant.Â The risk assessment results are taken into consideration when determining funding decisions and applying possible additional conditions on an award.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>The State has determined based upon local needs to allocate no more than 40 percent of ESG funds to operations and essential services related to shelter and street outreach. Of the funds that are awarded for rapid rehousing and prevention services, no more than 20% may go toward prevention services and no less than 80% to rapid rehousing services. No more than 30% of a subrecipient's budget may be dedicated to HMIS activities.</p>



	<b>Describe threshold factors and grant size limits.</b>	The WVDO does not assign threshold factors for ESG. Grants are awarded based upon previous year's spending, a documented need supported by data, and the applicants ability to meet objectives prescribed in federal regulations and funding availability.
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>The method of distribution ensures that subrecipients possess the financial and organizational capacity to address the needs of those experiencing homelessness and at risk of becoming homeless in their service areas. These needs will be addressed through providing quality emergency shelter, rapid rehousing and prevention services and street outreach to those currently experiences homelessness. The ultimate goal of ESG is to prevent homelessness and assist families and individuals experiencing homelessness to find housing as quickly as possible. ESG will aim to assist approximately 2100 individuals through ESG activities such as rapid rehousing, prevention and emergency overnight shelter.</p>
6	<p><b>State Program Name:</b></p>	<p>ESG-CV1 and ESG-CV2</p>
	<p><b>Funding Sources:</b></p>	<p>ESG-CV</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>ESG-CV funds will be awarded on a competitive basis through an open application process at least biannually. The State may act directly to administer programs as needed.</p> <p>An activity may be funded in whole or in part with ESG-CV funds only if all the following criteria are met for ESG-CV funds:</p> <ol style="list-style-type: none"> <li>1. Non-profit 501(c)(3) organizations registered within the State may apply along with units of general local government.</li> <li>2. Each activity must be eligible under HUD ESG program regulations.</li> <li>3. Documentable connection between the coronavirus impact on client needs as a result of COVID-19 pandemic and the applicant's service delivery.</li> <li>4. Number of low- and moderate-income persons served.</li> <li>5. The relationship to ESG program design objectives.</li> <li>6. The level of documented need in the project area.</li> <li>7. The readiness of the project to proceed if funded.</li> <li>8. Other programmatic considerations, applicant's capacity to administer and operate the project and grant, if approved, fair housing initiatives, impact upon minority areas, and the geographical distribution of funds will be reviewed.</li> <li>9. Duplication of benefits- Applicants will be required to complete DOB documentation at application and will be required to continue to report on DOBs throughout the expenditure period for the ESG-CV funds.</li> </ol>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>All Application Review: All applications determined to be eligible will be reviewed for funding. To the extent applicable, criteria to be considered during the review will include:</p> <ul style="list-style-type: none"> <li>a) ESG program proposal and estimation of homeless/at-risk of homelessness persons/households served,</li> <li>b) the relationship to ESG program design objectives,</li> <li>c) the Continuum of Care's review and recommendation of the applicant to successfully administer the grant program and how it supports the CoC Strategic Plan,</li> <li>d) the degree to which the project will address homelessness in the service area and how the applicant will use referrals and M.O.U.'s with partner organizations to assist in the accomplishment of applicant program goals,</li> <li>e) the cost effectiveness of each proposed program activity in comparison to the estimated number served,</li> <li>f) the degree to which the project achieves state, regional, and local goals in providing stable and affordable housing and supportive services to homeless/at-risk of homelessness households,</li> <li>g) the readiness of the program to begin with awarded funds and the organizational and programmatic capacity to administer activities,</li> <li>h) the proposed outcomes and accomplishments the project is to achieve</li> <li>i) any open ESG awards, any past grant awards, in regard to monitoring findings, both programmatic and fiscal</li> <li>j) any past instances in which past awarded funding has been revoked or recaptured for reallocation</li> <li>k) additional items identified in ESG-CV1 and ESG-CV2 applications</li> </ul>
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<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not Applicable.
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>The WV Development Office will accept applications from any non-profit 501(c)(3), unit of general local government, or a Public Housing Authority.</p> <p>Applicants should complete the ESG-CV proposal and associated forms and attachments by submission to the WV Development Office by mail, or electronically to the current program manager in accordance with instructions outlined in the guidelines as posted at <a href="http://www.wvcad.org/emergency-solutions-grant">http://www.wvcad.org/emergency-solutions-grant</a></p> <p>Eligible activities include all activities listed in the interim rule and additional flexibilities and waivers provided as part of the Mega Waiver for ESG-CV funds. Emphasis will be placed on the Rapid Rehousing and Homelessness Prevention categories of the program.</p> <p>All applications will be reviewed for completeness and eligible activities. Part of the evaluation is based on the participants' involvement in the CoC and knowledge of the programs or activities of the applicant and/or its vendors. No application will be funded with less than 75% of available points.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not Applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>In accordance with the Interim Rule of December 5, 2011, emphasis will be placed on the Rapid Re-housing and Homelessness Prevention categories of the program.Â This will be in place with ESG-CV funds as it has been expressed through consultation that rental assistance within Homelessness Prevention will be a great need in keeping individuals housed who have fallen behind on rent payments due to COVID-19. WV will give greater priority to applicants for Rapid Re-housing/Homelessness Prevention of those who are chronically homeless, homeless veterans, and/or homeless families and children.</p> <p>The WVDO understands that with WV's unique geographical and socioeconomic makeup of the state, it is understood that each agency has diverse and differing needs to serve the homeless population. It is in this regard that the WVDO does not attempt to dictate what eligible activities are to be used but instead let the organizations decide on what is best for their coverage areas.</p>

<p><b>Describe threshold factors and grant size limits.</b></p>	<p>WV intends to make initial grant awards of no less than \$10,000 and no more than \$175,000 per applicant for the provision of the following ESG components: 1. Street Outreach 2. Emergency Shelter 3. Homelessness Prevention 4. Rapid Re-housing 5. Homeless Management Information System (HMIS) 6. Administration or any combination of components in response to COVID-19. Applicants must demonstrate that the proposed activities will meet all program requirements and be undertaken in a timely fashion. Requests for additional funds will be considered upon expending initial awards.</p>
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>These funds will continue to support our regular ESG goals in assisting project sponsors with the additional costs due to COVID-19 and response to, in preparation of, and to prevent the further spread of COVID-19.</p> <p>The expected outcomes for the ESG program is:</p> <ul style="list-style-type: none"> <li>● Shelter beds provided - 200 persons</li> <li>● Rapid Rehousing - 100 persons</li> <li>● Homelessness Prevention - 1000 persons</li> </ul>
7	<p><b>State Program Name:</b></p>	HOME
	<p><b>Funding Sources:</b></p>	HOME

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The projected use of funds reflects the strategy of the State for the use of HOME funds in order to increase the supply of decent, safe, sanitary, and affordable housing. This strategy is based upon the consolidated plan, the identification of local priorities, and making commitments that are consistent with the objectives of the HOME Program. The method of distribution is designed so that the supply of decent, safe, sanitary, and affordable housing is increased providing funds that will enable families at or below 80% AMI to purchase houses; allow for the acquisition construction and/or rehabilitation of rental units; provide operating expense grants to CHDOs; and allow the State to administer the HOME Program for the entire State.</p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>HOME Leverage Loan Program: The criteria to be considered during the review will include, but are not limited to: (1) the total family income; (2) front-end and back-end ratios; (3) mortgage and lending underwriting; and (4) the ability to sustain the home.</p> <p>HOME Rental Programs: The criteria to be considered during the review will include, but is not limited to: Developer capacity, Fiscal soundness of developer(s), Continuous site control in the name of the ownership entity, Identification and commitment of other funding sources, Project feasibility, Examination of market conditions to ensure an adequate need, Number of assisted units, and Subsidy layering of federal funds. The final selection criteria will be detailed in the RFP.</p> <p>CHDO Operating Expense Grant Funds: As a result of HUD's approval, the criteria to be considered during the review will include: Need for Grant Program; Experience and qualifications of paid employees; Timeliness and accuracy of past draw submissions.</p>

<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not applicable.
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not applicable.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>As a result of HUD's approval The \$4,729,494 HOME award will be approximately allocated as: CHDO no less than Set-Aside is 0% of award, CHDO Operating no greater than 10% of award, HOME Rental 62% of award, Leverage 3% of award, and Admin 2510% of award. The estimated \$2,000,000 Program Income will be approximately allocated as HOME Rental 75% of PI and Admin no greater that 25% of PI.</p>

<p><b>Describe threshold factors and grant size limits.</b></p>	<p>HOME Leverage Loan Program: funding per award is limited to \$14,999.</p> <p>HOME Rental and CHDO Programs: funding is limited to \$800,000 per project, unless WVHDF underwriting determines otherwise, and the HUD maximum per unit subsidy limit for all HOME-assisted units in the project. As a result of HUD's approval, the CHDO Set-Aside requirement is 0% for FY2019.</p> <p>CHDO Operating Expense Grant As a result of HUD's approval, funding is limited to no greater than 10% of the FY2019 HOME Allocation, which is \$472,949; the requirement that a CHDO not currently receiving CHDO Set-Aside funding for a specific project must expect to receive such funding with 24 months is waived; and the amount may exceed the higher of \$50,000 or 50% of the CHDO's annual operating budget.</p> <p>Administration: As a result of HUD's approval, funding is limited to 25% of the FY2019 allocation, which is \$472,949, and 25% of HOME program income.</p>
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>&lt;div&gt;HOME Leverage Loan Program: as a result of the method of distribution, the outcome measure is providing funds to leverage additional funds for the purchase 10 single family houses.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;&lt;div&gt;HOME Rental Program: as a result of the method of distribution, the outcome measure is 70 rental units.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;&lt;div&gt;CHDO Program: Following HUD’s approval, the outcome measure is 0 rental units.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;&lt;div&gt;CHDO Operating Expense Grant Program: Following HUD’s approval, the outcome measure is anticipated to provide operating expense grants to 8 CHDOs.&lt;/div&gt;&lt;div&gt;&lt;/div&gt;&lt;div&gt;Administration: Following HUD’s approval, the outcome measure is to provide the state with the funds necessary to operating the HOME Program with additional flexibility to better assist low-and very-low income households as they deal with the effect of the COVID-19 pandemic.&lt;/div&gt;</p>
8	<p><b>State Program Name:</b></p>	<p>HOPWA</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The WVDO manages the HOPWA program for the State of West Virginia. The WVDO ensures project sponsors will provide affordable housing and prevent homelessness among persons living with HIV/AIDS and their families. HOPWA funding provides housing assistance and related supportive services to develop community-wide strategies and form partnerships with non-profit agencies across the state. HOPWA funds can be used for a wide range of housing and essential services costs.</p> <p>As a threshold consideration, all applicants must demonstrate how their housing or service projects directly serve persons who are homeless as defined by HUD and demonstrate how the housing and services provided will improve housing stability for those persons. Applicants must describe homeless verification methods, and how they will track outputs and outcomes (stable housing) for persons served. HUD ESG funds are available to nonprofit organizations (including community and faith-based organizations). Agencies must demonstrate collaboration with local mainstream service providers and local provider groups that are dedicated to housing and service interventions that serve persons experiencing homelessness. Agencies must also participate in HUD-mandated continuum of care planning appropriate to the jurisdiction where their activities are located.</p> <p>Funding decisions will be based on several factors, including but not limited to, population to be served; the eligibility of described activities; minimum criteria for organizational capacity, community or service area need; past or projected project performance; responsiveness to timeliness and information requested; and HMIS performance.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<ol style="list-style-type: none"> <li>1. All applications must be submitted before the deadline to be considered for review. Any application received after the deadline will not be reviewed.</li> <li>2. If all applicable sections of the application are not completed, the application will not be scored.</li> <li>3. All applications that meet the standards outlined above will be scored and evaluated by a review team comprised of WVDO staff.</li> <li>4. Each question in the narrative is worth 10 total points and will be scored by component.</li> <li>5. Each appendix is worth 5 points.</li> <li>6. Budget/Outcome forms are worth 50 points each.</li> <li>7. Points may be deducted for compliance issues for applicants who have had the grant in the previous years.</li> </ol>
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<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not applicable.
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not applicable.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>The WVDO will facilitate a request for proposals (applications) advertised through the CoC network and posted online for HIV/AIDS service providers. The RFP will gather information on the number of persons/households they plan to serve, housing plans, housing services, organizational capacity, performance goals, supportive services, and their proposed budget. At the end of the application period, all complete eligible applications are reviewed by a team of WVDO staff and a risk assessment is performed for each eligible applicant. The risk assessment results are taken into consideration when determining funding decisions and applying possible additional conditions on an award.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>WVDO remains committed to housing concerns for the targeted population of these funds. With this, housing is a critical component and at least 60 percent of all HOPWA funding is dedicated to housing activities.</p>

	<b>Describe threshold factors and grant size limits.</b>	The WVDO does not assign threshold factors for HOPWA. Grants are awarded based upon previous year's spending, a documented need supported by data, and applicants ability to meet objectives prescribed in federal regulations and funding availability.
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>The method of distribution ensures that subrecipients possess the financial and organizational capacity to address the needs of those experiencing homelessness and at risk of becoming homeless in their service areas. These needs will be addressed through providing a suitable living environment for those living with HIV/AIDS. At least 80 percent of households assisted with HOPWA funding are to remain stably housed after a year.</p>
9	<p><b>State Program Name:</b></p>	<p>HOPWA - CV</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA-CV</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>HOPWA-CV funds will be awarded to existing PY2019 project sponsors as they have full geographic coverage of the state in providing services.</p> <p>The full range of HOPWA activities will be funded for project sponsors as long as the following criteria are met and is subject to change based on the issuance of the final Federal Register for HOPWA-CV funds:</p> <ol style="list-style-type: none"> <li>1. Each activity must be eligible program activities.</li> <li>2. Each activity must be in response to, in preparation of, or to prevent the spread of COVID-19.</li> <li>3. Documentable connection between the coronavirus impact on client needs as a result of COVID-19 pandemic and the applicant's service delivery.</li> <li>4. Number of low- and moderate-income persons served living with HIV/AIDS and their families.</li> <li>5. The readiness of the project to proceed, if funded.</li> <li>6. Other HOPWA considerations, applicant's capacity to administer and operate the project and grant, if approved, fair housing initiatives, impact upon minority areas, and the geographical distribution of funds will be reviewed.</li> </ol>
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<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	Applications will not be available for this funding as the additional award of HOPWA-CV is \$84,023 and enough only to assist our current project sponsors in the additional costs in response to COVID-19.
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<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not applicable.
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not applicable.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>The WV Development Office will accept proposals from eligible 501(c)(3) organizations currently serving as project sponsors. In the event an existing project sponsor does not request HOPWA CV funds, applications will be solicited for that coverage area.</p> <p>Applicants should complete the HOPWA proposal and associated forms and attachments by submission to the WV Development Office by mail, or electronically to the current program manager in accordance with instructions outlined in the guidelines as posted at <a href="http://www.wvcad.org/housing-opportunities-for-persons-with-aids">http://www.wvcad.org/housing-opportunities-for-persons-with-aids</a>.</p> <p>All applications are reviewed for completeness and eligible activities. Then the applications will be evaluated based on a 205 point scale. Part of the evaluation is based on the participants' involvement in the CoC and knowledge of the programs or activities of the applicant and/or its vendors. No application will be funded with less than 75% of available points.</p> <p>Grantees will disperse the funds based on the need for the full range of eligible activities: short term rent, mortgage, and utility payments; tenant based rental assistance; resource identification; permanent housing placement and supportive services.</p>
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<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Each applicant provides a detailed response to the six areas delineated in the HOPWA program announcement listed below along with their Outcome measures.</p> <ol style="list-style-type: none"> <li>1. Estimate the number and characteristics of eligible persons who will be served by the proposed activities. Provide a description of how their eligibility for participation in the program will be determined.</li> <li>2. List the general locations and costs of the proposed activities.</li> <li>3. Describe how the proposed activities will address urgent and supportive service needs (not currently addressed by available public and private resources) of eligible persons. Include a description of the public and private resources that are to be made available in connection with the proposed HOPWA-supported activities.</li> <li>4. Describe the method used (outreach, referrals, existing shelter network) to inform eligible persons of housing assistance/services availability. Describe the process for selecting program participants.</li> <li>5. Describe procedures that have been, or will be, implemented to ensure coordination of HOPWA assistance with state and local government agencies responsible for providing services to persons with AIDS or related diseases. Include, where applicable, a description of coordination efforts with Ryan White funded agencies. Describe how community-based, non-profit HIV/AIDS services organizations have been consulted and involved in the application planning process.</li> </ol>
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	<b>Describe threshold factors and grant size limits.</b>	Usage of HOPWA funding for grantees will be in proportion to the number of live HIV/AIDS cases in each respective region. Additionally, service utilization patterns have been factored into this distribution.
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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Outcome measures are the number of persons/households that will receive housing assistance based on established goals and objectives. The HOPWA program will provide decent affordable housing to benefit low income persons living with HIV/AIDS by providing services to 644 households through tenant based rental assistance, short term rent, mortgage and utility assistance, supportive services, permanent housing placement, and resource identification.Â This will enable clients to establish and/or maintain a stable living environment in housing that is decent, affordable, safe and sanitary.Â Thus, through better access to care and support, there is an improved quality of life and increased housing stability for HIV/AIDS clients and their families. HOPWA-CV funds will be used to further support these outcomes in response to COVID-19.</p>
<p><b>10</b></p>	<p><b>State Program Name:</b></p>	<p>Housing Trust Fund</p>
	<p><b>Funding Sources:</b></p>	<p>HTF Housing Trust Fund</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The projected use of funds reflects the strategy of the State for the use of HTF funds in order to increase the supply of decent, safe, sanitary, and affordable housing for extremely low income and very low income populations. This strategy is based upon the consolidated plan, the identification of local priorities, and making commitments that are consistent with the objectives of the HTF Program. The method of distribution is designed so that the supply of decent, safe, sanitary, and affordable housing is increased by providing funds that will allow for the construction, acquisition, and rehabilitation of rental units for extremely low income and very low income populations in the State.</p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p><u>HTF Program</u>: The criteria to be considered during the review will include, but is not limited to: Developer capacity; Fiscal soundness of developer(s); The extent to which to project has Federal, State or local project-based rental assistance so rents are affordable to extremely low income and very low income populations in the State; Continuous site control in the name of the ownership entity; Identification and commitment of other funding sources; Project feasibility; Examination of market conditions to ensure an adequate need; Number of assisted units; and Subsidy layering of federal funds. The final selection criteria will be detailed in the RFP.</p>

<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	Not applicable.
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<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>Not applicable.</p>
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<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>Not applicable.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p><u>HTF Rental Program</u>: will provide funds for nonprofit and for profit developers for the development (new construction, acquisition, and/or rehabilitation) of rental housing opportunities for extremely low income and very low income populations in the State. Up to 90% of the grant award (up to \$2,700,000) and program income will be allocated to this funding category.</p> <p><u>Administration</u>: will be used by the West Virginia Housing Development Fund in the administration of the HTF Program for the State. 10% of the grant award (\$300,000) and program income will be allocated to this funding category.</p>

	<b>Describe threshold factors and grant size limits.</b>	<u>HTF Rental Program</u> : funding per award is limited to \$1,300,000, unless WVHDF underwriting determines otherwise, and must comply with the HUD maximum per unit subsidy limit.
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<b>What are the outcome measures expected as a result of the method of distribution?</b>	<u>HTF Rental Program</u> : As a result of the method of distribution, the outcome measure is 50 rental units.
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**Discussion:**

Additional administrative requirements for CDBG program are described below:

**Cost Overruns:**

Requests for cost overruns may be submitted at any time during the year and considered without competition. Cost overruns cannot include an increase in the scope of the approved project unless it is clearly demonstrated that the new scope is required by regulatory agencies. In addition, cost overruns cannot bring a project's total above the funding ceiling established for the project type. The Director of the Community Development Division has the authority to approve cost overruns less than \$100,000. All others must obtain IJDC approval (for water and sewer projects only) and must be approved by the Governor's Office.

**Cost Underruns:**

The WVDO reserves the right to recapture all unexpended funds remaining upon project completion. If the total amount of the awarded project contract (or contracts) is less than the approved budget cost for construction, excess CDBG funds cannot be used to add items or activities or change the scope of the project unless additives were used in the bid document. All requests must have prior approval from the WVDO. Grant funds that remain available following a cost underrun or bid underrun is subject to recapture and may be prorated with other funding agencies.

**Grant Anticipation Notes (GANS):**

Due to the WVDO's efforts to improve its expenditure rate, a new program is being initiated to allow grantees that have a full split year commitment to borrow funds in anticipation of a future CDBG allocation. This will allow projects to move forward in a timely manner and not wait for the formal commitment of CDBG funds. The application forms have been altered to include a line item for all costs associated with the GANS. If project has potential to be considered for a GANS, a \$50,000-line item is recommended to ensure that all soft costs associated with this interim financing program are covered.

**Minimize Displacement:**

Section 104(d) of Title I of the Housing and Community Development Act of 1974 contains requirements for a residential anti-displacement and relocation assistance plan. Each State recipient must adopt, make public, and certify to the State that it is following a "residential anti-displacement and relocation assistance plan." The Federal Register at 24 CFR, Part 570.488, sets forth relocation, displacement, replacement housing, and real property acquisition policies and requirements applicable to the State

CDBG program.

### **Land Acquisition Requirements Prior to Bidding**

The Grantee must obtain all land, rights-of-ways and easements necessary for carrying out the project prior to bidding the project. The provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 are applicable to the purchase of real property and all permanent easements. Please see HUD Handbook 1378: Tenant Assistance Relocation and Real Property Acquisition for additional information. See Chapter 10: Property Acquisition for additional details.

## AP-35 Projects – (Optional)

### Introduction:

CDBG: The State has no planned projects for 2019 that will carry over from 2018. All 2019 CDBG funded projects will be selected through a competitive review process.

HOME: The HOME Program does not identify specific projects requiring HOME funds. However, the WVHDF issues RFPs for developers to request HOME funds to develop a project.

HTF: The HTF Program does not identify specific projects requiring HTF funds. However, the WVHDF issues RFPs for developers to request HTF to develop a project.

The ESG and HOPWA programs do not identify specific projects to be funded. Funding for ESG and HOPWA projects will not be determined until program-specific applications are received and evaluated, and the grant agreement has been executed. The WVDO uses an application process for nonprofit agencies for both ESG and HOPWA and funds those projects that best meet the needs of their CoC and communities.

#	Project Name
1	CDBG Administration
2	State Technical Assistance
3	CV-CDBG State Admin
4	CV-CDBG State TA
5	CV-Berkeley-Morgan County Health Department Expansion Project
6	CV-City of Moundsville Emergency Payments Project
7	CV-Harrison County Emergency Assistance Project
8	CV-Marshall County Emergency Payment Project
9	CV-Randolph County COVID Housing and Utility Assistance Project
10	CV-Wetzel County Emergency Payments
11	CV-Taylor County Health Department

#	Project Name
1 2	CV-Mingo County Commission COVID Relief Program
1 3	CV-Webster County Commission Camden on Gauley Medical Center
1 4	CV-City of Morgantown Citywide Food Pantry Program
1 5	CV-City of Morgantown Citywide Rental and Utility Assistance Program
1 6	CV-Pocahontas Memorial Hospital HVAC/Roof Replacement
1 7	CV-Shepherdstown Housing and Utility Relief Fund
1 8	CV-Facing Hunger Food Bank
1 9	CV-Mountaineer Food Bank Mobile Pantry

**Table 5 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Funding priorities and categories are slightly modified within the CDBG program, with the addition of broadband planning and infrastructure last program year. However, the development of water and sewer infrastructure remains a high priority. While federal funding exists to address critical needs, West Virginia communities will continue to struggle with inadequate water systems, creating more need than available funding. Each investment of CDBG funding will improve these circumstances; however, many residents will continue to struggle with inadequate and/or unsafe water and wastewater systems.

Realizing that infrastructure development forms the basic foundation for other opportunities, the WVDO will continue to invest in viable projects to develop suitable living conditions and create an environment conducive to community and economic development in low- to moderate-income areas. Similarly, broadband development projects will be reviewed to ensure consistency with the State's



Consolidated Plan.

In addition to the challenges associated with infrastructure development, as described above, specific obstacles to meeting underserved housing needs include:

- West Virginia housing costs exceed household income
- Significant quantity of substandard housing
- Absence of state resources for affordable housing
- Increased federal priority on community integration for disabled persons has highlighted a severe shortage in subsidized, affordable, and accessible housing
- Serious market decrease in the demand for tax exempt bonds has limited leveraging opportunities
- Rural challenges to providing homeless services

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Development of Public Infrastructure Job creation and retention Increase the supply of affordable housing
	<b>Needs Addressed</b>	CDBG Priority 1 (Infrastructure Development) CDBG Priority 2 (Facilities and Services) CDBG Priority 3 (Job Creation)
	<b>Funding</b>	CDBG: \$373,455
	<b>Description</b>	State Administration
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	State Administration Allocation to assist in the completion of all funded projects and to administer the State CDBG Program.  State Administration allocation \$373,455.00 -- Projected  State Administration Allocation to assist in the completion of all funded projects and to administer the State CDBG Program.
2	<b>Project Name</b>	State Technical Assistance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Development of Public Infrastructure Job creation and retention Increase the supply of affordable housing
	<b>Needs Addressed</b>	CDBG Priority 1 (Infrastructure Development) CDBG Priority 2 (Facilities and Services) CDBG Priority 3 (Job Creation)
	<b>Funding</b>	CDBG: \$136,727
	<b>Description</b>	State allocation for Technical Assistance
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	State Allocation to assist with Technical Assistance required to assist communities with community and economic development activities.

<b>3</b>	<b>Project Name</b>	CV-CDBG State Admin
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$800,000
	<b>Description</b>	State of West Virginia Administration of CDBG-CV Grant Program.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A. State Admin.
	<b>Location Description</b>	The CV-CDBG State Admin Program will administer the CDBG-CV Program throughout the State of West Virginia.
	<b>Planned Activities</b>	Admin.
<b>4</b>	<b>Project Name</b>	CV-CDBG State TA
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$182,841
	<b>Description</b>	State Technical Assistance for CDBG-CV Program.
	<b>Target Date</b>	1/21/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A.
	<b>Location Description</b>	Technical Assistance will be provided throughout the State of West Virginia in both entitlement and non-entitlement areas.
	<b>Planned Activities</b>	Technical Assistance.
5	<b>Project Name</b>	CV-Berkeley-Morgan County Health Department Expansion Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$126,000
	<b>Description</b>	County Health Department Expansion Project.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The CV-Fairmont Family Relief Fund will assist approximately 50 households in the City of Fairmont impacted by the COVID-19 Pandemic in need of emergency rental, mortgage, and utility assistance.
	<b>Location Description</b>	Services will be provided to City of Fairmont residents, impacted by the COVID-19 Pandemic, and in need of emergency rental, mortgage, and utility assistance.
	<b>Planned Activities</b>	Public Service Activities to provide emergency rental and utility assistance.
6	<b>Project Name</b>	CV-City of Moundsville Emergency Payments Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development

	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	Emergency Rental, Mortgage, Utility Assistance Program.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>7</b>	<b>Project Name</b>	CV-Harrison County Emergency Assistance Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	Emergency Assistance Project.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
	<b>Project Name</b>	CV-Marshall County Emergency Payment Project

8	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	Emergency Rental, Mortgage, Utility Assistance Project.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
9	<b>Project Name</b>	CV-Randolph County COVID Housing and Utility Assistance Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG: \$172,450
	<b>Description</b>	Emergency Housing and Utility Assistance Project.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	
<b>1 0</b>	<b>Project Name</b>	CV-Wetzel County Emergency Payments
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	Emergency Rental, Mortgage, and Utility Assistance Project.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>1 1</b>	<b>Project Name</b>	CV-Taylor County Health Department
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG: \$1,500,000
	<b>Description</b>	Construction project to house the operation of a local health department to accommodate public health services such as COVID-19 testing, case investigation, contract tracing and vaccination.
	<b>Target Date</b>	6/30/2023



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>1 2</b>	<b>Project Name</b>	CV-Mingo County Commission COVID Relief Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$250,000
	<b>Description</b>	Emergency mortgage and utility assistance program for those impacted by the COVID-19 Pandemic.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,300 Households
	<b>Location Description</b>	Mingo County.
<b>Planned Activities</b>	Emergency Mortgage, Utility, and Food Assistance.	
<b>1 3</b>	<b>Project Name</b>	CV-Webster County Commission Camden on Gauley Medical Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)

	<b>Funding</b>	CDBG-CV: \$500,000
	<b>Description</b>	Medical Center Build Out/Expansion Project. Project is qualified under Urgent Need.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	8,386 Individuals
	<b>Location Description</b>	Webster County
	<b>Planned Activities</b>	Facilities Rehab
<b>1 4</b>	<b>Project Name</b>	CV-City of Morgantown Citywide Food Pantry Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$500,000
	<b>Description</b>	Emergency food pantry services for those impacted by COVID-19.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Emergency Food Pantry for LMI persons/households impacted by COVID-19.
	<b>Location Description</b>	City of Morgantown, WV.
	<b>Planned Activities</b>	Emergency Food Bank services.
<b>1 5</b>	<b>Project Name</b>	CV-City of Morgantown Citywide Rental and Utility Assistance Program
	<b>Target Area</b>	

	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$500,000
	<b>Description</b>	Emergency rental and utility assistance for LMI City of Morgantown residents impacted by COVID-19.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	80 LMI Households
	<b>Location Description</b>	City of Morgantown, WV.
	<b>Planned Activities</b>	Emergency rental and utility assistance.
1 6	<b>Project Name</b>	CV-Pocahontas Memorial Hospital HVAC/Roof Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$1,576,764
	<b>Description</b>	Pocahontas Memorial Hospital HVAC/Roof Replacement Project
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	8657 Individuals will potentially benefit. This project is qualified under Urgent Need.
	<b>Location Description</b>	

	<b>Planned Activities</b>	Pocahantas County.
<b>1 7</b>	<b>Project Name</b>	CV-Shepherdstown Housing and Utility Relief Fund
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$60,000
	<b>Description</b>	Emergency Housing and Utility Assistance Program.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 LMI households impacted by the COVID-19 pandemic will benefit from this project.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Emergency rental and utility assistance.
<b>1 8</b>	<b>Project Name</b>	CV-Facing Hunger Food Bank
	<b>Target Area</b>	
	<b>Goals Supported</b>	Local Community Development
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$600,000
	<b>Description</b>	Emergency Food Bank
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	64,420 Individuals throughout the State.
	<b>Location Description</b>	Statewide.
	<b>Planned Activities</b>	Emergency food distribution.
1 9	<b>Project Name</b>	CV-Mountaineer Food Bank Mobile Pantry
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	CDBG Priority 2 (Facilities and Services)
	<b>Funding</b>	CDBG-CV: \$1,000,000
	<b>Description</b>	Emergency Food Bank - Mobile Pantry
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Emergency mobile food pantry service will 1500 households.
	<b>Location Description</b>	Statewide.
	<b>Planned Activities</b>	Emergency food distribution .



## **AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

**Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

Yes

### **Available Grant Amounts**

No commitment to guarantee shall be made if the total outstanding notes or obligations guaranteed under the Section 108 program exceed \$7,000,000. The amount any one project may receive shall be limited to not more than \$3,000,000 or less than \$100,000. It should be noted that Section 108 funds may not be used for administrative costs. Additionally, only Section 108 projects that create new jobs will be considered for funding.

### **Acceptance process of applications**

Project application documentation shall be evaluated for meeting basic HUD eligibility requirements. Projects must attract private investment and be financially feasible. No funds may be used for the refinancing of existing debt. The quality of the jobs to be created; the relationship of the project to State economic development initiatives or plans; and standard credit considerations that include the assessment of risk, the terms of the loan, and the availability of accepted collateral will be considered.

Review analysis will include, but will not be limited to:

1. Types of jobs to be created or retained, benefits provided, opportunity for longevity.
2. Historical and projected financial statements prepared in accordance with generally

accepted accounting principles.

3. Personal financial statements of stockholders in the "for-profit" business being assisted.
4. Appraisals, environmental assessments, historical reviews, surveys, and feasibility studies.
5. Resumes of the management team of the "for-profit" being assisted.
6. Product description and analysis.
7. Market analysis of the project or service.
8. Loan commitments, option agreements, leases, and/or borrowing agreements, as appropriate.

Complete Section 108 applications will be accepted on a continuing basis. Applications determined to be eligible and fulfilling all HUD requirements will be reviewed. The State reserves the right to request and require any additional information or impose additional requirements it determines necessary to make a responsible decision regarding the loan. After having evaluated the proposed application, the final decision as to whether to forward the application to HUD will be at the sole discretion of the West Virginia Economic Development Authority.



## **AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

**Will the state allow units of general local government to carry out community revitalization strategies?**

Yes

### **State’s Process and Criteria for approving local government revitalization strategies**

Community Advancement and Development Program Priority: The State will not refuse to award funds based on the activity selected by a local unit of government. However, grant awards will emphasize the State’s commitment toward the objectives stated within this plan.

The Community Advancement and Development Division Director reserves the right to work with any eligible unit of local government on a new type of application based on community needs. This may be a pilot project to establish guidelines for a future type of application to be included in the program design. These projects must have a documented inability to compete under the categories listed below and assist the State's commitment toward objectives stated within this plan. The application ceiling will be \$500,000. The funds will be allocated based upon availability of funds at the time of application.

Self-Help Water: The applications meet the above criteria. Applications will be solicited through the Regional Planning and Development Councils. Self-Help Water applications will be accepted year-round, based upon the availability of funds. The Director reserves the right to establish the application deadline based on the specific needs of the project.

Local financial participation will lend value to the consideration of any proposal. A project may address a single need or address a substantial portion of the identified community development and housing needs. Activities serving different geographic areas must be qualified separately.

## **AP-50 Geographic Distribution – 91.320(f)**

### **Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed**

Funds for the programs described within this plan are not distributed based upon geographic factors. The competitive application process allows for the justification of needs to locally-driven projects that address priority needs. Therefore, the 2019 Action Plan aims to serve any geographic area of the State of West Virginia that expresses need.

Investing across a large and diverse area is challenging; however, WVDO and WVHDF continue to evaluate its methods of distribution to assure that funds for these critical programs (CDBG, ESG, HOME, HTF, HOPWA) meet the priority needs within West Virginia. Each program varies in its methods for fund distribution, but as a rule WVDO gives priority to non-entitlement areas within the state. Each specific program is tailored to meet federal and program specific regulations and to best meet the needs specific to each target population.

As per AP-65, for the ESG Program, WVDO requires each subrecipient to prioritize funds based on those individuals with the greatest need and highest barriers to housing. The subrecipients must identify a process determining what qualifies as the highest need which many times involves the utilization of the scores derived from the coordinated assessment.

For CDBG funding, the WVDO works with the State Data Center to complete two assessments of data, in addition to the HUD Low- and Moderate-Income Statistical Data (LMISD). The State's Distressed Index Analysis and a Per Capita Investment Analysis are also considered during the funding application process. The Distressed Index provides a variety of population data with corresponding scores and rankings.

The Distressed Index Analysis includes, but is not limited to: income, employment, poverty and housing data. Higher distressed rate equals higher rank and score. The Per Capita Investment Analysis provides a historical list of all CDBG investment by county including per capita investment with a corresponding rank. A lower per capita investment equals higher rank.

During the CDBG application review and scoring process, up to an additional 5 points may be awarded to each application based on the project's Per Capita Investment by County ranking and up to another 5 points based on the Distressed County Index ranking. Applications with a higher Per Capita Investment by County rank and with a higher Distressed County rank are awarded more points in these areas. It should be noted that the two R/ECAP communities in the state of West Virginia, McDowell and Cabell Counties, are areas with higher Per Capita Investment ranks and higher Distressed County Index ranks. Applications benefiting R/ECAP communities are likely to receive full points in both to these

areas.

HOME and HTF: The geographic areas in which an affordable housing project may receive direct HOME and/or HTF assistance includes all fifty-five counties in the State. The WVHDF conducts a Site & Neighborhood Standards Review for each proposed HOME or HTF project to confirm compliance with 24 CFR 92.202 and 24 CFR 93.150, respectively, in order to provide housing that is suitable from the standpoint of facilitating and furthering full compliance with the applicable provision of title VI of the Civil Rights Act of 1964, the Fair Housing Act, and promotes greater choice of housing opportunities. This review ensures compliance with 24 CFR 983.57(e) and notates the (i) adequacy of site; (ii) site conditions; and (iii) site standards.

### Geographic Distribution

Target Area	Percentage of Funds

Table 6 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

CDBG: Funding supports projects and activities in non-CDBG entitlement areas.

HOME: The rationale for the entire State as the entire geographic priority area results from: The need for affordable housing, whether new construction or rehabilitation, exists for the State's fifty-five counties. Consequently, there are no Target Areas within the State receiving a percentage of HOME and/or HTF funds.

HTF: The rationale for the entire State as the entire geographic priority area results from: The need for affordable housing, whether new construction or rehabilitation, exists for the State's fifty-five counties. Consequently, there are no Target Areas within the State receiving a percentage of HOME and/or HTF funds.

ESG: Funding is not allocated based on a geographic distribution method. Allocation is determined based on data supported identification of need.

HOPWA: Funding is not allocated based on a geographic distribution method. Allocation is determined

based on data supported identification of need.

**CARES ACT Amendment**

CDBG-CV1-Non-Entitlement local units of government.

CDBG-CV-2 and CDBG-CV3-Statewide.

ESG-CV1 and CV 2: Statewide geographic distribution serving the homeless or at-risk of homelessness and units of general local government.

HOPWA-CV: Statewide geographic distribution to non-profit organizations serving persons living with HIV/AIDS and their families.

**Discussion**

As stated above, the entire State is the geographic area for which a proposed affordable housing project may receive HOME and/or HTF assistance. Resulting from the limited amounts of HOME and HTF funding, the WVHDF relies on a proposed project's market study and the Statewide Housing Needs Assessment to confirm an adequate market exists for the project.

Because the State's significant affordable housing needs exceed the limited amount of HOME and HTF funding, the WVHDF equitably ranks proposed projects so that HOME and HTF funds are judiciously awarded. Moreover, the WVHDF provides technical assistance and offers a reasonable, competitive developer fee to encourage developers to submit proposals that respond to the affordable housing needs throughout the State. All these features are used to encourage the submission of project applications so that HOME and HTF funds may be used to address communities needing affordable housing. Furthermore, for LIHTC projects requesting HOME and/or HTF, application scoring includes points awarded for Property Location and Housing Needs Characteristics, which give additional weight to distressed locations.

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

#### Introduction:

The State will focus its HOME Program resources on three areas:

1. HOMEownership Opportunities (HO) with the HOME Leverage Loan Program (HLLP).

The State's HOME Program (Program) is operated as a direct program. The WVHDF, the State-designated HOME Program administrator, issues a permanent financing commitment for a project when all Program conditions are met, and the State retains full control of the quality of the loans. In most instances, HLLP loans are closed in the name of the WVHDF as an instrumentality of the State. Nonprofit Housing Providers, approved lenders, or government entities will be responsible for the submission of compliance documents before closing. Closing agents will be responsible for any compliance documents to be prepared or delivered at, or immediately following, the loan closing.

The Fund may offer leveraging opportunities during FY 2019. Leveraging will be offered to families with incomes at or below 80 percent area median income. The adoption of the leveraging plan will simultaneously include the implementation of procedures sufficient to ensure full compliance with all necessary regulations.

2. Community Housing Development Organizations (CHDOs) - At least fifteen percent (15 percent) of the State's allocation will be set aside for CHDO.

3. HOME Rental with loans to promote the improvement and creation of rental housing opportunities for low- and very low-income families.

The HOME Program offers loans to CHDO, nonprofit, and for-profit developers for the acquisition, new construction, and/or rehabilitation of affordable projects. Specific application information is available in the annual RFP and RFP Guidelines on the WVHDF website.

The State will focus its HTF Program resources on: HTF Program with loans to promote the new construction, acquisition, and/or rehabilitation of rental housing units for extremely low- and very low-income populations. The State's HTF Program is operated as a direct program.

The WVHDF, the State-designated HTF Program administrator, issues a permanent financing commitment for a project when all Program conditions are met, and the State retains full control of the

quality of the loans.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	134
Special-Needs	0
Total	134

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	59
Rehab of Existing Units	65
Acquisition of Existing Units	10
Total	134

**Table 9 - One Year Goals for Affordable Housing by Support Type**

**Discussion:**

With the limited HOME and HTF resources awarded by HUD to the State of West Virginia, on its own, is not enough to significantly address the affordable housing needs in the State. The number of affordable housing units is dependent on the collaborative partnerships with other groups (nonprofits, community action agencies, continuum of cares, housing authorities, community development agencies, for profit developers) and investments to expand the supply of affordable housing in the State.

In addition, them WVDO and WVHDF have participated in the Housing Policy Group to forward goals and efforts to facilitate affordable housing the State of West Virginia. This group included representatives of major housing advocates and stakeholders in the development, administration and management of affordable housing resources. The collaboration was designed to develop a

comprehensive plan for affordable housing and responds to specific initiatives outlined therein. The WVDO and WVHDF will continue to accomplish goals consistent with the 2015-2019 Consolidated Plan and the housing framework created to achieve the same result.

The WVHDF maintains email list serves to communicate with housing partners. In addition the WVHDF conducted conference calls to discuss and explain the RFP application with prospective developers.

The State will use CDBG-DR funds to create several affordable housing units through the 2019-2020 program year. One-year goals include, but are not limited to, serving the following households:

Homeless population: 2

Non-homeless population: 409

Special needs population: 0

The State of West Virginia is allocating \$71,899,250 to provide replacement single-family housing. All applicants in the CDBG-DR Housing Program are from Low- and Moderate-Income households. The State is also allocating \$16,000,000 for a Rental Housing Repair Program with a focus on prioritizing those properties that are occupied by low-to-moderate income tenants and received a high amount of flood damage.

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

Public housing authorities (PHAs) are an important component of the state affordable rental housing delivery system. The public housing authorities provide subsidized rental housing units and tenant based rental assistance (certificates/vouchers) for low and moderate income households throughout the state. However, since local housing authorities are established by units of local government subject to state enabling legislation, neither the State nor the WVHDF have direct oversight of the operations of local public housing authorities.

The WVHDF frequently communicates with the public housing authorities located in the State regarding HLLP, HOME Rental and HTF.

### **Actions planned during the next year to address the needs to public housing**

While the WVDO does not have jurisdiction over public housing agencies, several public housing authorities and other housing and community development agencies that use federal funds are required to obtain a certification that their program plans are consistent with the Consolidated Plan for their jurisdiction. The State Consolidated Plan serves the majority of the state since only a few local jurisdictions develop Consolidated Plan documents.

#### Planned Actions:

- Serve as the lead agency for reviewing housing plans for consistency with the housing component of the State Consolidated Plan. Applicants for federal funds must submit their requests for a Certification of Consistency with the Consolidated Plan to the WVDO prior to submitting their applications to the appropriate federal agency.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Most often, lack of understanding about the home buying process poses a barrier to affordable housing. A lack of knowledge regarding the options, requirements, and variables inherent in the home buying process can place a potential home buyer at risk for entering into a purchase that does not truly fit their individual budget or circumstances. Positive educational efforts can provide potential home buyers with the base of knowledge they need to make informed decisions and place them in a home that they can



afford.

As the largest public housing authority in the State, the Charleston-Kanawha Housing Authority (CKHA) models programs that support residential involvement and leadership. Of CKHA's 12 sites, approximately six maintain strong, active councils. CKHA management meets with these councils on a quarterly basis to discuss management practices and policies, resident concerns, complaints, and activities. These resident councils act as the overall Resident Advisory Board (RAB) for CKHA. The CKHA is governed by a five-member board appointed by the Mayor of the City of Charleston, with two of those members recommended by the Kanawha County Commission. One of the five board members *must* be a resident of CKHA. This needs to be updated.

The CKHA offers a Family Self-Sufficiency (FSS) Program for residents of both public housing and Section 8. The objective of the FSS program is to help motivated families move toward self-sufficiency. In a similar initiative, CKHA's Housing Choice Voucher Homeownership Program is designed to promote and support homeownership by first time buyers through the use of HUD's Housing Choice Voucher program. Instead of using their voucher assistance to support a monthly rental payment, the homeownership program will permit qualified families to achieve the dream of homeownership and still only have to pay thirty percent (30%) of their monthly-adjusted income toward their mortgage, escrow, and utilities.

The Homeownership program is made possible through various partnerships. Under the Housing Counseling and Homeownership Religious Coalition for Community Renewal (RCCR), 268 families received counseling, 24 families attended the Homebuyer Education class and 31 families became first time home owners during the period 7-1-17 and 6-30-18. This needs to be updated.

The CKHA has had 22 successful Section 8 Homeownership purchases and the program is a great testimony to the collaborative efforts of Federal, State, and local agencies as well as private and non-profit groups.

Planned Actions:

- Support the homebuyer education program by providing information about HLLP. In the homeownership education class, instructors take participants through each step of the home buying process, from budgeting to loan closing
- PHAs also assist residents with a number of programs designed to help motivated families work toward personal, financial and residential goals
- The partner agencies will continue to increase collaboration with the PHAs and plan to conduct public hearings at PHA sites
- The WVHDF is willing to partner with PHAs to finance opportunities for participating families

**If the PHA is designated as troubled, describe the manner in which financial assistance will be**

## **provided or other assistance**

Local housing authorities are established by units of local government subject to state enabling legislation, neither the State nor the WVHDF have direct oversight of the operations of local public housing authorities.

Overall, housing authorities in West Virginia continue to serve the public in a satisfactory manner, according to HUD measurement standards. Currently, there is one “troubled” PHA in the State of West Virginia – Weirton PHA. The WVDO will continue to share information that may be of benefit to Weirton PHA or any public housing authorities, for the continuous improvement of performance.

### **Discussion:**

The WVDO will work closely with the Charleston HUD office Public Housing staff to keep track of the status of PHAs. WVDO will work with the Charleston HUD office to identify opportunities to engage any PHAs that are identified as “troubled,” and develop information and support to assist in areas of deficiency. With this partnership with Charleston HUD, there will be regular communication developed with “troubled” PHAs to assist in the identification of corrective action steps to address deficiencies. WVDO will also look for opportunities for face-to-face engagement such as attending PHA meetings to share information and problem solve. The WVDO will encourage PHA attendance of training events held by the WVDO and will work to participate in training events held by PHAs. This collaborative effort will assist in developing and maintaining positive working relationships with PHAs to increase the effectiveness of housing and homelessness initiatives. Although the State does not have direct oversight or jurisdiction of PHAs, the WVDO can seek to work with any other State agency who may provide funding to PHAs, in order to facilitate corrective actions for those with a “troubled” status. Creating such a relationship with other state agencies, if applicable, as well as a strong partnership with Charleston HUD will allow for greater overall oversight of PHAs within West Virginia.

## **AP-65 Homeless and Other Special Needs Activities – 91.320(h)**

### **Introduction**

The State will continue working to reduce and end homelessness with all four continuums of care. The WVDO will continue to award funds to subrecipients at the local level to deliver housing and non-housing homeless services to persons in need.

The Consolidated Planning process identified existing programs and services that assist the State of West Virginia's homeless and other special needs populations as well as gaps in the delivery system. The State has a network of homeless assistance providers including emergency and domestic violence shelters, street outreach workers and community advocates that work together to refer those experiencing homelessness to services that assist them to regain stable housing. The State works diligently to increase the number of providers offering Rapid Rehousing so as to allow shelter beds to be available on an emergency basis.

One Year Action: Encourage through the application process the emphasis of increasing affordable housing for special needs populations given these vulnerable populations can be difficult to reach. The WVDO will aim to provide funding to a network of providers the incorporate rapid rehousing and outreach as a primary function of the homeless programs, with a goal of more than half of the entities funded providing such services.

ESG-CV and HOPWA-CV will be utilized the same as ESG and HOPWA with all program activities being funded. CV funds will be used in relation to COVID-19 in response to, in preparation of, and prevention of further spread.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The WVDO, through the administration of the ESG grant, requires all subrecipients to participate in the point-in-time count and actively participate in their CoC and coordinated assessment process. Through coordination with CoCs, subrecipients are in contact with Projects for Assistance in Transition from Homelessness (PATH) workers who primarily work to locate and engage unsheltered persons and families. As a result of these efforts, subrecipients regularly reach out to and assess the needs of those experiencing and at risk of homelessness. Funds are available each year for subrecipients to provide street outreach as a way to reach out to individuals and connect them to resources. However, it is

expected that there will be less street outreach activities funded in the 2019 program year than previous years due to the number of applications received.

One Year Action: The WVDO recognizes that street outreach is a valuable tool to engage individuals experiencing homelessness into the continuum of services that can begin to assess their individual needs. The ESG Program plans to reach the 2100 individuals served goal by utilizing the activities described above by actively pursuing eligible participants through all allowable avenues and utilizing partners and a strong referral system internally within organizations, as well as externally, to supplement outreach efforts.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Through the State of West Virginia's ESG Program, the State leverages multiple funding sources to meet the needs of individuals and families experiencing homelessness. The WVDO encourages the use of emergency shelters throughout the state as a critical piece of the crisis intervention. In 2018, WVDO awarded ESG funding to 18 subrecipients to meet the emergency shelter needs of residents. The WVDO encourages subrecipients to connect those experiencing homelessness with emergency shelter where they can be linked with mainstream and supportive services. These shelters should strive for a length of stay of 30 days or less.

One Year Action: The WVDO will continue to fund shelter operations next year and will make final determinations once applications are received. The State of West Virginia no longer funds transitional housing. While transitional housing programs still exist and serve a critical access point for those not able to be placed in permanent housing. The State has seen a significant number of transitional housing programs convert to permanent supportive housing and will continue to explore and encourage these changes as appropriate when needs are assessed through the annual Housing Inventory Count (HIC).

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The State places an emphasis on rapid rehousing as an important tool to transition and/or quickly house individuals and families in need. The State's ESG program also encourages shelters to meet the goal so that no one is in shelter for more than 30 days. During the 2018 ESG competitive application round, the State required shelter applicants to either create a rapid rehousing component or to prove community partnership with an existing rapid rehousing program that would provide such services to those in the

shelter.

The WVDO requires each subrecipient to prioritize funds based on those individuals with the greatest need and highest barriers to housing. The subrecipients must identify a process of determining what qualifies as the highest need. Many subrecipients utilize the scores derived from the coordinated assessment to determine the highest need.

One Year Action: The WVDO will continue to emphasize the importance of rapid rehousing through the application process so that more sites will provide rapid rehousing services.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

In lieu of a state plan for clients afflicted with a mental illness, the four Continuums of Care within the state independently address discharge planning procedures on a local level through member coordination with comprehensive behavioral health centers in their respective region when these clients are engaged in the coordinated entry process. While a number of mental health patients return to the care of family and friends upon discharge, some clients of state hospitals or diversion facilities lack a support system capable or willing to provide even short-term shelter. When no discharge plan is in place, or clients are unable to care for themselves, CoC and centralized intake staff provide referrals to resources such as personal care homes and assisted living facilities, in addition to direct support, including assistance with an application for public housing, searches for private market housing, and referral to local social service and mainstream benefit providers. If eligible for Emergency Solutions Grant funding, case managers will assess the client needs and assist them in completing requirements to receive those benefits. WV is a recipient of the Emergency Solutions Grant in which agencies and shelters from across the state are funded to provide rapid re-housing and other support services to those individuals at or below 30% AMI.

Members of the Northern Panhandle Continuum of Care (NPCoC) regularly review all discharge planning protocols and work with specific stakeholders, including two local hospitals, to ensure there are adequate procedures for ensuring people who are institutionalized are not discharged and become homeless. Within the NPCoC, the development and implementation of innovative service models, such

as Community Engagement Specialists, allow Greater Wheeling Coalition to End Homelessness (GWCFH) staff to take an active role in discharge planning, the scheduling of medical appointments, assistance with housing placement, and on-going monitoring and maintenance care. When necessary, GWCFH staff contact a mental health liaison, as well as family or friends to make shelter arrangements. Specific destinations when discharged from mental health facilities include private market rate apartments, family/friends' homes, or state/local-funded housing options such as Northwood Health Systems. Most recently, GWCFH began attending local Northern Panhandle Reentry Council meetings in an effort to develop new partnerships and bring awareness to proper discharge planning standards as it relates to homelessness.

The Cabell-Huntington-Wayne Continuum of Care (CHWCoC) Coordinated Entry Team has worked to develop partnerships with publicly funded institutions, systems of care, and public/private service agencies. Representatives from those organizations/systems participate in the CoC Coordinated Entry Subcommittee, which works to ensure persons at-risk of homelessness are connected to resources at intake that will help to prevent homelessness at discharge. The CE team includes a homelessness prevention and diversion component, which includes intensive supportive services for categories 2-4 to ensure they do not become category 1 homeless. CHWCoC also has a prevention/diversion team that is privately funded and operated by Information & Referral services. This team provides supportive services and financial assistance to prevent homelessness, taking referrals from the above-mentioned systems of care.

In the Kanawha Valley Collective Continuum of Care (KVCCoC) the hospital care system is quite extensive with several major hospitals within the coverage area. Through the CE process, potential clients are assessed and connected to whatever CoC or ESG funding and resources that are available.

**Please continue to the Discussion section of AP-65 below to read the remainign portion of this narrative. Thank you.**

## **Discussion**

The WVDO and the four CoCs continue to work to address key issues for those experiencing homelessness in our State.

In addition, the WVHDF has participated in Housing Policy Group to forward goals and efforts to facilitate affordable housing the State of West Virginia. This group included representatives of major housing advocates and stakeholders in the development, administration and management of affordable housing resources. The WVHDF will continue to accomplish goals consistent with the 2015-2019

Consolidated Plan and the housing framework created to achieve the same result.

The WVHDF interacts with several active, vibrant CHDOs that openly discuss methods to effectively address and meet the needs of affordable housing for low-income families in various regions within the State.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care continued:**

The largest challenge lies within the more rural counties within the state. The majority of area within the state is covered by the Balance of State CoC (BoS CoC), or WV Coalition to End Homelessness (WVCEH) which serves 44 counties. There is a far greater need for case management and support services upon exit from publicly funded institutions and systems of care. It is a large challenge for these rural areas as there typically lacks any major health systems or local hospitals that may provide any sort of adequate protocols for connecting these individuals to services upon exit. Many of these individuals, who do not return home to family or friends, enter into the homeless population. ESG or CoC funded programs and shelters may be their only source for assistance in being connected to services, case managers, finding housing or emergency shelter. WVCEH has been working with the Adult and Juvenile justice system mental health providers (PSYMED, Inc.) to address the discharge issue and has appointed a staff member to begin working on the administrative level on the healthcare systems of care across our CoC. Otherwise, most people who are seeking housing resources are being connected to the CE hotline through shelters, outreach, or self-referral.

The State is also working to coordinate efforts amongst the four Continuums of Care and create and foster partnerships with additional statewide service providers to enhance collaborative resources and services for the homeless and those at risk of homelessness. This working group operates in the absence of the West Virginia Interagency Council on Homelessness (WVICH) which has been inactive during the past program year. Until the organization is reactivated, the working group will continue to meet in order to address the goals and strategies stated within *“Opening Doors in West Virginia: A Plan to Prevent and End Homelessness/2015-2020.”*

One Year Action: Through the collaboration with the four CoCs, a greater emphasis will be placed on identifying a need to call attention to polices as necessary to address key items.

**AP-70 HOPWA Goals – 91.320(k)(4)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	80
Tenant-based rental assistance	13 0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	21 0



## **AP-75 Barriers to affordable housing – 91.320(i)**

### **Introduction:**

The WVDO and WVHDF and its housing partners will continue efforts to lower the barriers to affordable housing identified in the strategic plan and below. In addition to taking actions to alleviate barriers to affordable housing, the State is also dedicated to ensuring that fair access to housing is not only in affordable units but throughout the entire housing market is addressed.

- Provide a range of educational and technical assistance opportunities for lenders, homebuyers and other housing organizations including comprehensive instruction on promotion of fair housing and compliance to the Fair Housing Act and related Acts;
- Identification of fair housing issues, including those specific to protected classes;
- Continued and expanded involvement with a coalition of homeless service providers on identification of training needs and community needs, as well as policy and strategy development including work with federal, state and local organizations to increase capacity to address public awareness of fair housing;
- Continued usage of programs along with expanded utilization of outreach methods to access hard to reach populations and combat barriers faced by vulnerable populations.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The State intends to take the following specific actions to remove negative effects of public issues that serve as barriers to affordable housing:

#### **Barrier: Predatory Lending**

Planned Actions: (a) Meet with lenders operating in the HOME program to raise awareness; (b) Continue to place an emphasis on the topic in homebuyer education courses; and (c) Thoroughly review and discuss re-financing options with current HOME Program mortgage holders as inquiries are received.

#### **Barrier: Homeownership Education**

Planned Actions: (a) Require HLLP borrowers utilizing the Program to also attend homebuyer education

#### **Barrier: Community Opposition**

Planned Actions: (a) Review policies/procedures to identify issues that have the potential to create

obstacles to the creation/placement of affordable housing; (b) Seek out opportunities to provide training to raise awareness on the facts of affordable housing and to alleviate fears and the benefit it offers

**Barrier: Populations with Special Needs**

Planned Actions: (a) Address the lack of specific guidance or training which explains the circumstances under which the FHA and ADA may require housing providers to allow applicants and tenants to use service/assistance animals; (b) Enhance work with HOPWA providers and PHAs to develop policies/procedures that allow for those living with HIV/AIDS to receive vouchers through confidential channels.

**Barrier: Down payment and Closing Costs**

Planned Actions: (a) Utilize HLLP to qualified participants to borrow up to \$14,999 at 0% interest rate with a term of five years; reduced by 20%/year that the homebuyer occupies the housing as principal residence

**Barrier: Cost of Affordable Housing**

Planned Actions: (a) Review study by WVU that centers on the costs of construction for affordable housing which could be a driver in future policy development; (b) Consult with the homebuilding industry, local governments, and affordable housing advocates in considering the potential impact of state statutes and state/local regulations on the affordability of housing; (c) Evaluate program change effectiveness issues to address affordable housing across the State and identification of additional gaps and actions to combat such gaps; coupled with promotion of supplemental loan programs to assist low-income homebuyers

**Barriers: Housing Quality**

Planned Actions: (a) Require that all HOME assisted construction projects meet the provisions of the International Building Code (IBC); (b) Emphasize the attainment of public health/safety goals for new construction/maintenance in most cost effective manner

**Discussion:**

Additional Barriers to those listed in Strategic Plan:

**Lack of functional policies that address the State's housing challenges**

*West Virginia Housing Policy Framework: Developed in 2013 by West Virginia Housing Policy Work*

Group. CommunityWorks in West Virginia convened a group of stakeholders in the planning process, under a grant from the Claude Worthington Benedum Foundation. The group established broad goals and policy direction related to housing policy to address the state's housing challenges. The framework includes five major goals, with specific recommendations for each:

- Raise the importance of housing in state governance and promote accountability, effectiveness and consistency in housing policy administration
- Increase resources for housing development, preservation and rehabilitation
- Promote statewide planning, coordination and integration of housing with other state improvement efforts
- Increase the quality and quantity of housing stock
- Ensure that West Virginia can meet the housing needs of its senior, special needs, and homeless populations

A copy of the *West Virginia Housing Policy Framework* is available at the following location:

<https://communityworkswv.org/member-services>

**Sexual harassment in rental housing:** One of the topics of a new rule from HUD to protect the most vulnerable women from predatory landlords.

Planned Actions: As appropriate and possible, the WVDO will work with the WVHRC to attend landlord meetings to discuss the topic and inquire of reported instances. The State will produce educational information to provide tenants with resource information through nonprofit organizations that serve this vulnerable segment of the State's population.

#### **Discrimination within Housing Brokerage Services**

Planned Action: The West Virginia Association of Realtors and the West Virginia Real Estate Commission train real estate professionals in Fair Housing, Cultural Diversity and Ethics. The WVDO and WVDHF continue to stress the importance of Fair Housing to the Association and Commission. At this time, the WVDO and WVHDF are working on plans to conduct a joint training session with the West Virginia Association of Realtors to the format of the Association's existing training for Diversity and Fair Housing as required for real estate professionals.

## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

In addition to the actions described elsewhere in this plan the following other actions will be pursued.

### **Actions planned to address obstacles to meeting underserved needs**

Despite efforts made by service providers, a significant number of obstacles must be overcome in order to meet underserved needs. Planning and effective use of limited resources is critical to addressing needs. The State works to increase focus on compliance with federal regulations through monitoring and program evaluation in an effort to continue to identify obstacles and solutions and create opportunities for future funding.

#### **Obstacle: Lack of accessible and comprehensive housing statistics and data**

##### **Planned Actions:**

- WVHDF's website offers a link to the 2014 Statewide Housing Needs Assessment, which offers a comprehensive overview of housing in West Virginia. The 2014 Statewide Housing Needs Assessment is available at the following location: <https://www.wvhdf.com/about-wvhdf>
- The WVHDF is conducting a 2019 Housing Needs Assessment.

#### **Obstacle: Lack of means of communication/inquiries regarding programs for underserved applicants**

##### **Planned Actions:**

- WVHDF's website has multiple locations in which a user can click to request more information about the HOME program, HTF program, and other applicable programs.

#### **Obstacle: Ability to target projects in locations of greatest need**

##### **Planned Actions:**

- Developers submitting a HOME or HTF application must submit a market analysis that thoroughly examines neighborhood market conditions and realistically demonstrates need for

the project for which HOME and/or HTF funds are being requested.

**Obstacle: Increased need for supportive services for no/low income individuals/households**

**Planned Actions:**

- Funding providers that connect participants to mainstream services, such as employment services, job training programs, housing vouchers, financial literacy classes

**Obstacle: Challenges of effective usage of land/property and zoning opportunities**

**Planned Actions:**

- See Discussion Section

### **Actions planned to foster and maintain affordable housing**

The State of West Virginia will take the following actions during the 2019 program year to preserve affordable housing units that may be lost from the assisted housing inventory:

**Planned Actions:**

- Utilize and expand the Home Repair Component of the Low-Income Home Energy Assistance Program provided through the West Virginia Weatherization Assistance Program carried out by Community Action Agencies
- Utilize the United States Department of Agriculture (USDA) Rural Development Home Repair Program (Section 504 Home Repair Program) by both referring low income participants of other programs as well as potentially partnering existing programs with this program
- Review annually all CoC Housing Inventory Charts to examine current available housing inventory, take action as necessary to preserve current inventory
- Examine and utilize the 2014 WVHDF Statewide Housing Needs Assessment created to provide a comprehensive housing assessment that focuses on the current and anticipated housing need in each of the 55 counties of West Virginia
- HOME Rental Training to provide instruction emphasizing compliance requirements to employees of owners/developers of HOME projects during the affordability period, which aids in fostering and maintaining affordable housing
- WVHDF co-sponsors an annual West Virginia Housing Conference, which allows housing agencies and individuals involved with housing throughout the state to learn and collaborate

on a variety of housing topics including how to maintain (and add to) the current affordable housing inventory

### **Actions planned to reduce lead-based paint hazards**

The State has varying processes in place from different programs to both assess whether lead-based paint hazards exist, and alleviating such hazards, if allowable by a particular program's regulations.

The West Virginia Office of Maternal, Child and Family Health, Childhood Lead Poisoning Prevention Program, is the central point of data collection concerning lead exposure through the Healthy Homes Lead Poisoning Surveillance System. West Virginia Code, Chapter 16-35-4a, requires a blood level screening for children under the age of 72 months. This information is reported to the State Health Department. The screening incorporates an assessment of the child's environment and social conditions to determine risks for lead poisoning. At a minimum, programs provide identification of hazards and participant education if such hazards cannot be addressed by a State program. The State is currently working to increase the number of children in the screening program, as part of its current grant with the U.S. Centers for Disease Control.

The HOME program ensures that any pre-1978 property be inspected and any lead-based paint issues are addressed pursuant to 24 CFR 58. The HOME program undertakes the following steps to mitigate the presence of lead-based paint in any HOME-assisted property through the following actions:

- Conducting visual lead inspections (and physical testing) of any structure where appropriate per specific program guidelines;
- Completing appropriate measures to remove the hazard during rehabilitation or reconstruction of homes when allowable and re-inspection of situation when required;
- Ensuring that organizations are properly certified to identify, test, and alleviate lead based paint hazards;
- Providing program participant education regarding lead based paint hazards and information on how such hazards can be alleviated (if remedies are not allowable by a particular program); and
- Ensuring program staff and organizations abide by the West Virginia Lead Abatement Law and Rule and other Environmental Protection Agency (EPA) and Occupational Safety and Health Administration (OSHA) regulations as applicable.

### **Actions planned to reduce the number of poverty-level families**

Through the programs offered by the State, program recipients will work with participants to connect

them to mainstream public and private benefits as well through referrals to other programs to build a variety of skills in order to reduce the number of individuals and families in poverty. Recipients are encouraged to work with other social service providers in the community, such as the Community Action Agencies which are the network of agencies dedicated to eliminating poverty.

Planned Actions:

- Provide participants with supportive services such as life skills training, job skills training, education etc.
- Provide connection to employment opportunities
- Provide opportunities to maximize income such as the Earned Income Tax Credit Program
- Coordination and cross-training/education with housing partners to build a foundation of knowledge at all participating organizations of available assistance and programs, as well as systems that focus on ending homelessness
- Increasing the supply of affordable housing through programs such as HOME Leverage Loan, HOME CHDO and HOME Rental Programs
- Increasing the supply of affordable housing through the HTF program.

**Actions planned to develop institutional structure**

The State has established an institutional structure to address the needs of poverty-level families and homeless persons. The State works with many different organizations, both public and private, to continue to develop and maintain the institutional structure as follows: the community economic development activities of programs are carried out through contractual agreements with units of local government. The housing activities, both production and preservation activities, are accomplished through partnerships with units of local government, non-profits, housing developers, and specifically through partnerships with state certified Community Housing Development Organizations (CHDOs). Homelessness, HIV/AIDS, and other special needs services result from WVDO and WVHDF's relationship with a network of non-profit service providers including shelters and units of local government across the state of West Virginia. The West Virginia Department of Health and Human Resources (WVDHHR) is the primary agency responsible for the delivery of financial services and other services to poverty-level families throughout the entire state who also plays an important role in the structure.

The following are gaps/weaknesses as identified in the strategic plan and associated actions planned:

Gap/Weakness: **Providing targeted funding in areas of greatest need given limited providers and**

## **funding**

### Planned Actions:

- Create additional partnership and collaborations to be able to reach the areas of the state of greatest need
- Increase program educational opportunities from the State to encourage new providers

### Gap/Weakness: Lack of PHA oversight by the State

### Planned Actions:

- Increase partnership opportunities with these entities to complete local projects or activities
- Share information about regulations, updates to programs, and new potential opportunities

## **Actions planned to enhance coordination between public and private housing and social service agencies**

The institutional structure developed fosters coordination between public and private housing and social services agencies, in collaboration with the State. Continuously improving this coordination remains a priority for the State.

### Planned Actions:

- Utilize planned conference opportunities to increase networking and communication among available housing providers, both public and private
- Utilize CoC participation in landlord association meetings to bridge the gap of available resources

## **Discussion:**

The State has limited amounts of developable land in certain regions due to the mountainous topography. The planned reuse of abandoned residential property, coupled with the productive reuse of idled and underutilized commercial, industrial and mining properties, will maximize this valuable resource and foster the redevelopment of areas with existing public infrastructure. In addition, many communities continue to struggle with abandoned properties that decrease property value and deter the development of additional affordable housing. The WVDO participates when possible to enhance collaboration between individuals and groups developing strategies to address these land and property



issues.

While many planning and zoning issues are addressed in West Virginia Code, Chapter 8A: Land Use Planning, many areas of the State lack the expertise to fully implement each component of the land use planning law. To address this need, the West Virginia University College of Law, Land Use and Sustainable Development Law Clinic (LUSD Law Clinic) continues to provide legal services to local governments, landowners, and non-profit organizations to develop land conservation strategies and practices. The LUSD Law Clinic provides technical assistance to Local government officials, planners and other land use decision-makers to encourage sustainable development in appropriate areas of the community. For example, the LUSD Law Clinic works with several communities to draft comprehensive land use plans and ordinances, per the requirements of the West Virginia Code.

According to the Code, these comprehensive plans must be updated every 10 years. These comprehensive plans address the following issues: Land Use, Housing, Transportation, Infrastructure, Public Services, Recreation, Economic Development, Community Design, Preferred Development Areas, Renewal and/or Redevelopment, Financing, and Historic Preservation. In addition, comprehensive plans must be prepared prior to a subdivision or zoning ordinance. The West Virginia Land Stewardship Act, signed into law in 2013, created the West Virginia Land Stewardship Corporation (WVLS); a collaboration among multiple sectors to provide West Virginia and its citizens a statewide, nonpartisan community and economic development non-profit corporation.

The State brings agencies together to address issues and will continue to evaluate past development and future collaboration and increase training activities. The West Virginia Property Rescue Initiative was created in 2015 to assist cities, counties, and other eligible borrowers in the deconstruction, demolition and acquisition of residential structures. The WVHDF will provide technical assistance and funding to counties and municipalities for the identification, purchase, removal and rehabilitation of dilapidated properties. The removal of unsafe structures will improve the health and safety communities throughout the State, while preparing residential areas for future redevelopment.

The WVDO staff participated in the Mountain State Land Use Academy during the FY 2018 program year, and will continue to be involved in supporting these important initiatives. This ongoing partnership among lead agencies in this field will continue to enhance the State's approach to land use and zoning issues.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

CDBG: The State of West Virginia, consistent with the primary objective of CDBG funds plan the following actions:

- not less than 70 percent of the aggregate of the federal Title I assistance distributed under this program design statement shall be used for the support of activities that benefit persons of low and moderate income in the non-entitlement areas
- a minimum of 70 percent of CDBG funds will be used to benefit persons of low and moderate income over a consecutive three-year period.

Therefore, the 70 percent threshold will be maintained through the 2019 Annual Action Plan, as well as the period covered by the Five-Year Consolidated Plan, which spans Fiscal Years 2015 through 2019.

#### Additional key points:

- Program Income that does not exceed \$35,000 in a single year is retained by the unit of local government; thus, not reported here
- The State has not undertaken a project under the Urgent Need category. This category could be utilized in circumstances which meet stringent regulations.
- The State CDBG program has not undertaken a Section 108 program and, therefore, reports no proceeds.
- All activities which are eligible for federal CDBG funding, under Section 105 of the Federal Housing and Community Development Act of 1974, as amended, are eligible for funding. The State's method of distribution is provided in section AP-30: Annual Action Plan-Method of Distribution. The State's priorities are provided in section SP-25: Strategic Plan-Priority Needs.

HOME: The State of West Virginia, consistent with the primary objectives of the HUD HOME award will use estimated program income and leveraged funds to successfully implement the program.

#### Additional key points:

Eligible individuals/families to purchase or rent a HOME unit earn up to and including 80% AMI.

Eligible applicants for HOME funds will be for profit and nonprofit developers, who have demonstrated

the capacity for carrying out housing projects.

WVHDF will use the Request for Proposals (RFP) process for solicitation to receive applications requesting HOME funds for affordable housing. Detailed information regarding RFPs is obtained via WVHDF email list serve, WVHDF website, and a variety of meetings that a WVHDF HOME representative attends (i.e., public hearings, FAHE meetings, and the annual WV Housing Conference).

Each RFP will be thoroughly reviewed and ranked per the scoring criteria to determine funded projects.

Eligible populations receive HOME information through: a. network of nonprofits throughout the State; and b. the WVHDF website.

Since the State receives a small HOME award, and there is a great need for affordable housing, WVHDF does not limit beneficiaries or give preference to a particular segment of the low-income population.

**Community Development Block Grant Program (CDBG)  
Reference 24 CFR 91.320(k)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	0
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

100.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.320(k)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable: no other forms of investment are being used beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The WVHDF uses the following guidelines for recapture when used for homebuyer activities:

HOME Leverage Loan Program: If the original homebuyer no longer occupies the home as his or her principal residence, either voluntarily (i.e., sale or rental) or involuntarily (i.e., foreclosure), before the end of the Affordability Period applicable to that unit, the homebuyer may be responsible for repaying to the Fund the HOME funds that enabled the homebuyer to purchase the unit.

Affordability period follows 24 CFR 92.254 (a)(4): Homeownership assistance HOME amount per-unit and Affordability Period:

- Under \$15,000 - 5 years
  - \$15,000 to \$40,000 - 10 years
  - Over \$40,000 - 15 years
- The HOME Loan is subject to recapture under 24 CFR 92.254 and is subject to repayment if the HOME-assisted property does not meet the affordability period set forth above. The Recapture Policy will become effective if (a) the HOME-assisted homebuyer sells, transfers, or disposes the HOME-assisted property either voluntarily or involuntarily; (b) the HOME-assisted homebuyer, or if said homebuyer is married, the survivor of said homebuyer or said homebuyer's spouse, dies. The Fund will also require repayment of the outstanding balance of the HOME loan if the assisted homebuyer refinances the first mortgage loan (which was senior to the

Fund's loan) at which time the remaining principal balance is due unless the Fund and any other subordinate mortgagees agree to a one-time only subordination of their mortgage loans to the new first mortgage loan. An assisted buyer fails to or ceases to occupy the HOME-assisted property as their principal residence will be in default. The entire outstanding balance of the HOME assisted provided will be due (with no prorated forgiveness otherwise available under a HOME Leverage Loan). The Recapture Policy will follow the provisions set forth under 24 CFR 92.254(a)(5)(ii) to recoup all or a portion of the HOME Loan from the net proceeds of the sale. Net proceeds are the sales price of the HOME-assisted property less the superior loan repayment (other than HOME Loan) and any reasonable and customary closing costs incurred by the seller. If the Net Proceeds from the sale of the HOME-assisted property are sufficient to recapture the outstanding HOME Loan balance of the Promissory Note, the HOME-assisted homebuyer shall be allowed to retain the excess of the Net Proceeds. In the event Net Proceeds of the sale are insufficient to cover the outstanding HOME Loan balance of the Promissory Note, the HOME-assisted homebuyer will only be responsible for returning the Net Proceeds and any excess balance of the HOME loan will be forgiven.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

HOME Leverage Loan Program: If the original homebuyer no longer occupies the home as his/her principal residence, either voluntarily or involuntarily, before the end of the Affordability Period applicable to that unit, the homebuyer may be responsible for repaying to the Fund the HOME funds that enabled the homebuyer to purchase the unit. Affordability period follows 24 CFR 92.254 (a)(4):

Homeownership assistance HOME amount per-unit and Affordability Period:

- Under \$15,000 - 5 years \$15,000 to \$40,000 - 10 years Over \$40,000 - 15 years The amount of HOME funds subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit ("Direct HOME Subsidy"). Direct HOME Subsidy includes the down payment, closing costs, interest subsidies or other HOME assistance provided directly to the homebuyer. In addition, Direct HOME Subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. Recapture is limited to the net proceeds available from the sale. Net proceeds is defined as the sales price minus loan repayments (other than HOME funds) and closing costs. If the net proceeds from the sale of the unit are not sufficient to recapture the full amount of the Direct HOME Subsidy plus recover the amount of the homebuyer's down payment and any capital improvements made by the owner since purchase, the Fund will share the net proceeds proportionally with the homebuyer as follows. Same process as listed above in #2. If the net proceeds from the sale of the unit are sufficient to recapture the full amount of the HOME funds invested, plus recover the amount of the homebuyer's down payment and any capital improvements made by the owner since purchase, the homebuyer shall be allowed to retain the

excess net proceeds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

### **Emergency Solutions Grant (ESG) Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

All sites receiving ESG funding have been required by the WVDO to establish written standards for provision of emergency shelter, rapid rehousing and homelessness prevention. The State does not develop statewide written standards due to the complex needs and characteristics of the service areas where ESG assistance is provided. As part of the application and monitoring process the WVDO conducts reviews of each project sponsor's written standards to ensure they are compliant with all state and federal regulations. The monitor also ensures that those standards are being followed by reviewing client records and financial documentation.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

All four CoCs use the VI-SPDAT as the coordinated assessment. Meetings take place throughout the 4 CoC's to discuss prioritization lists and service delivery. The CoC acts as a single point of entry for the geographic area.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Applications are sent electronically to all current subrecipients, shared with the Continuum of Care lead for each CoC to be shared with the membership. Application and supporting materials are

made available on the WVDO website. Two technical assistance calls take place during the application period to provide clarification on the application process. At the end of the application period, all complete eligible applications are reviewed by a team of WVDO staff and a risk assessment is performed for each applicant. The risk assessment results are taken into consideration when determining funding decisions and applying possible additional conditions on an award.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

According to guidance from HUD, (<https://www.hudexchange.info/faqs/1111/to-whom-does-the-homeless-participation-requirement-at-24-cfr/>) this requirement does NOT apply to a recipient that is a State, or to subrecipients. State recipients may require subrecipients to provide for the participation of homeless or formerly homeless person(s) on their board or policy making entity. (See 24 CFR § 576.405(b)). However, the WVDO does review subrecipients' process for consulting with homeless or formerly homeless individuals in regards to program and policy development. Applicants are required, as a part of the application process, to detail how they request feedback from participants and what impact that feedback has on programs and policies.

5. Describe performance standards for evaluating ESG.

During the application process, applicants define their performance goals and plans for achieving those goals throughout the program year. These applications are reviewed to ensure that the performance goals align with the goal of ESG and all applicable state and federal regulations. Subrecipients receive both desktop and onsite monitoring each year. These monitoring processes focus on the subrecipients' compliance with all state and federal regulations as well as the adherence to agency specific policies, practices and goals.

### **Housing Trust Fund (HTF)**

**Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible applicants for HTF funding include nonprofit and for-profit entities and must meet minimum qualifications and demonstrate proficiency as developers and asset managers.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The application will provide evidence that the applicant, at minimum (all categories are minimum requirements and no points will be awarded):1. Will comply with the requirements of the HTF program and that rental units assisted with HTF will comply with HTF requirements;2. Demonstrate financial capacity to undertake, comply with, and manage the HTF eligible activity;3. Have experience and capacity to conduct eligible HTF activities by demonstrating ability to own, construct, manage and operate an affordable multifamily residential rental project that includes HTF units;4. Show familiarity with the requirements of other federal, state, or local housing programs that will be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such program through demonstrated experience with developing, owning, and managing affordable multifamily residential rental projects; and 5. Demonstrate the ability to understand and manage practices related to leasing to tenant populations at or below 30% AMI, including homeless households or persons with



special needs.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In addition to regulations (24 CFR 93) and State application criteria, eligible applicants submitting an application for HTF funding will be reviewed according to the following:

1. The extent to which a proposed project has federal, state, or local project-based rental assistance (up to 25 points available);
2. Demonstrate that the project is financially feasible for the 30-year affordability period (minimum requirement, no points awarded);
3. Gross tenant paid rent (tenant paid rent plus utility allowance) must not exceed 30% of AMI (minimum requirement, no points awarded);
4. Sources and uses of funds are clearly defined (minimum requirement, no points awarded);
5. Financial commitments (for HTF applications also requesting LIHTC, up to 25 points will be awarded for financial commitments);
6. Current market demand in the neighborhood in which the project will be located (minimum requirement, no points awarded);
7. Experience and capacity of applicant as evidenced by previous projects developed in the State (minimum requirement, no points awarded); and
8. Developer (development team) has no outstanding and/or unresolved issues of noncompliance after the end of the correction period as regulated by the State's Asset Management Department (minimum requirement, no points awarded).

When an application is received, it will be reviewed for eligibility, scored, and ranked.

Applications that comply with both the HTF regulations and application requirements will be issued a letter (letter of intent, waiting list letter, or denial letter). Applicants receiving a denial letter will not be further considered but should reevaluate the application and apply in response to a future HTF funding

round. Applications that are not fully completed and/or received after the submission date will be returned and not further considered.

All projects receiving a letter of intent will be subject to credit underwriting and undergo a subsidy layering review to ensure that the financing awarded is no greater than what is needed for financial feasibility. The affordability period for HTF projects will not exceed 30 years, since the WVHDF anticipates projects will require re-capitalization at approximately 30 years.

The State will be responsible for executing contracts.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

<p style="margin: 0in 0in 10pt;"><font face="Calibri" size="3">Resulting from the relatively small amount of HTF funds available the State will limit one HTF award per census tract in the 2019 funding cycle, unless no feasible alternative exists.</font></p>

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

While no application points are awarded for this category, since it's a minimum requirement, a review of the developer's capacity, from prior performance records, will include an assessment of the developer's ability to own, construct, manage, and operate an affordable multifamily residential rental project that includes HTF units. Developers who do not have a history of or have demonstrated an inability to own, construct, manage, and operate an affordable multifamily residential rental project that received federal funds will not receive a letter of intent for HTF funds.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For rental housing, the extent to which the project has Federal, State or local project-based rental

assistance so rents are affordable to extremely low-income families: For projects receiving HTF:

15 points will be awarded to a property which has property-based rental assistance (e.g. Rural Development, HUD, or applicable public housing authority) for at least 25% but less than 50% of the residential rental units in the property; OR

20 points will be awarded to a property which has property-based rental assistance (e.g. Rural Development, HUD, or applicable public housing authority) for at least 50% but less than 75% of the residential rental units in the property; OR

25 points will be awarded to a property which has property-based rental assistance (e.g. Rural Development, HUD, or applicable public housing authority) for at least 75% of the residential rental units in the property.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Developers whose projects receive HTF funding will execute and record a Declaration of Restrictive Covenants document for a 30-year affordability period. Complying with the 30-year affordability period is a minimum requirement, and no points are awarded for this category.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Funding includes the projects quality of housing characteristics including:

1. Energy Star Certified Whole-Unit HVAC, up to 15 points awarded
2. Energy Star Certified Kitchen Appliances, up to 15 points awarded
3. Energy Star Certified Exterior Doors and Windows, up to 15 points awarded
4. Stove Top Fire Suppression or Prevention, up to 15 points awarded
5. Energy Star Certified LED Light Fixtures, Ceiling Fans, and Bath Exhaust Fans, up to 10 points
6. Energy Star Certified Washer and Dryer, up to 20 points

i. Describe the grantee’s required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

For projects requesting HTF, without LIHTC and with or without HOME, application points will be awarded for the federal funds requested in relation to the total project costs.

LEVERAGE–PROPOSED HOME AND/OR HTF FUNDS REQUEST RELATIVE

TO TOTAL HOME and/or HTF PROJECT COSTS EQUALS: (maximum 30 points)

Less than or equal to 20%.....30

Greater than 20% to less than or equal to 40%.....20

Greater than 40% to less than or equal to 60%.....10

Greater than 60% to less than or equal to 100%.....0

4. Does the grantee’s application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select “N/A”.

Yes

5. Does the grantee’s application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select “N/A”.

Yes

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee’s goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.**

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

Please see the attached 2018 Maximum Per Unit Subsidy Limits for the HTF Program, which are identical to the HOME Program as a result of consistent construction costs throughout the state.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

Please see the attached Rehabilitation Standards.

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

**12. Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

**Discussion:**

The State of West Virginia is required to submit certification that it is affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). The certification has three elements and requires that the State of West Virginia: Complete an Analysis of Impediments to Fair Housing Choice (AI); Take actions to overcome the effects of any impediments identified through the analysis; and Maintain records reflecting the actions taken in response to the analysis.

The West Virginia Development Office (WVDO) and the West Virginia Housing Development Fund (WVHDF), are to report to HUD on planned actions to address these impediments at the beginning of each program year. At the conclusion of this program year, as part of the annual performance report for the Consolidated Plan, the State of West Virginia will report on its actions to affirmatively further fair housing.

The State of West Virginia had identified eight (8) original impediments to fair housing choice in its 1998 AI, and five (5) additional impediments in 2011 as directed by HUD as Special Matters of Requirement. The State submitted the 2014 AI Update as an adjunct document to the Consolidated Plan submission.

In May 2016, the State submitted its 2016 Update to the AI to provide historical information and propose actions to be taken during the upcoming year. Within the 2016 Update to the AI, the State provided the information necessary to remove five impediments from future reporting.

Following the May 2016 Update to the Analysis of Impediments (AI) in which five impediments were reviewed and presented for removal from further reporting, the State will focus its efforts and reporting on eight impediments. A new impediment was proposed in FY 2015: Unacceptable levels of sexual harassment in rental housing.

This brings the number of impediments needing to be addressed to nine. The State addressed all nine impediments in the 2018 Update to Analysis of Impediments to Fair Housing.

The State will be conducting a new study during 2018-19 to identify a new, up-to-date list of impediments that may be hindering residents of WV from freedom of housing choice. An Update to the Analysis of Impediments to Fair Housing is included with the 2019 Action Plan.

