

State of West Virginia

Fiscal Year 2016



Consolidated Annual Action Plan

May 9, 2016

Executive Summary

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

1. Introduction

The State of West Virginia's 2016 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 receiving Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funding. Pursuant to the authority by the State of West Virginia's Governor, Earl Ray Tomblin, the West Virginia Development Office (WVDO), West Virginia Housing Development Fund (WVHDF) and West Virginia Office of Economic Opportunity (WVOEO) will administer the above referenced federal funds on behalf of the State. CDBG is administered by the WVDO and acts as the lead agency for the State's Consolidated and annual Action Plan. The WVHDF administers HOME funding and the WVOEO administers the ESG and HOPWA funded programs. These State agencies have prepared the annual Action Plan for program year 2016, beginning July 1, 2016 through June 30, 2017.

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 the priority needs over the next program year that is also reflective of past performance. Additional documents related to the Annual Action Plan are submitted under separate cover as required. These documents include the Update to the Analysis of Fair Housing Impediments and related training agendas, meeting sign-in sheets, meeting advertisements and notices, comments, and responses.

2. Summarize the objectives and outcomes identified in the Plan

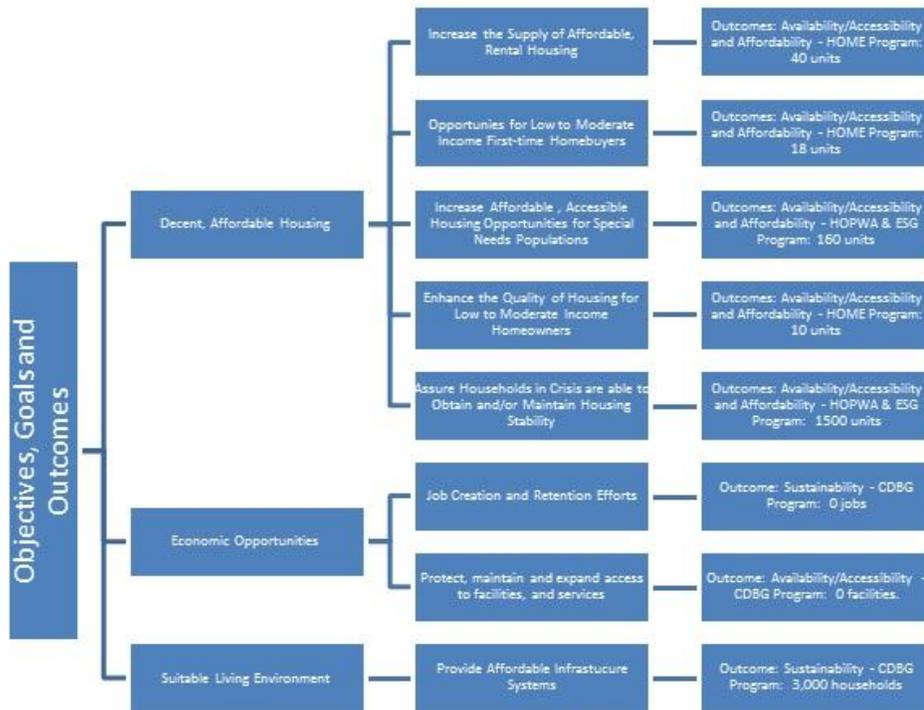
The State of West Virginia will continue to follow previously implemented performance measurements prescribed by HUD. All activities funded will address one of these three primary objectives which will provide an outcome of availability/accessibility, affordability and/or sustainability.

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 40 units
2. Support homeownership opportunities for low to moderate income first-time homebuyers: HOME Program 18 units
3. Increase affordable, accessible housing opportunities for special needs populations: HOPWA and ESG Program 160 individuals
4. Enhance the quality of housing for low to moderate income homeowners: HOME Program 10 units
5. Support local efforts to assure that households in a housing crisis are able to obtain and/or maintain housing stability: HOPWA and ESG Program 1500 individual
6. Support job creation or retention efforts: CDBG Program 0 jobs
7. Support local community development efforts to assist low- to 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
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 3000 households

Please see chart on the following page that clearly depicts the State's goals/activities, objectives and proposed outcomes.



Objective, Goals and Outcomes Chart

3. Evaluation of past performance

1. Increase the supply of affordable rental housing:

HOME Program Funding: Construction of 8 single-family housing units and 3 rental housing units

HOMERent Funding: 234 units that will serve tenants at or below 80% area median income

HOME CHDO Operating Assistance Grants: 15 HOME CHDOs

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

NewHOME Program: Construction of 6 new units and acquisition of 27 existing units

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

HOPWA and ESG Program:

- No data reported in 2014-2015 ESG CAPER specific to this question; however, over 1220 people were assisted overall.
- Total HOPWA housing subsidy assistance 245 households; total HOPWA households receiving supportive services 377

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

HOME Program: No data reported in 2014-15 CAPER specific to this question

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

HOPWA and ESG Program: No data specific to this question reported in the 2014-2015 CAPER

6. Support job creation or retention efforts:

CDBG Program: No projects were awarded in 2014 based on job creation or retention efforts

7. Support local community development efforts to assist low- to 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:

- Each infrastructure project that received CDBG funding will assist low-to moderate-income citizens in achieving an improved quality of life through the development of clean, reliable water systems and wastewater systems.
- These projects have 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.

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 \$12,346,271 in 14 public infrastructure projects - serve approximately 7,364 (low-to-moderate income)

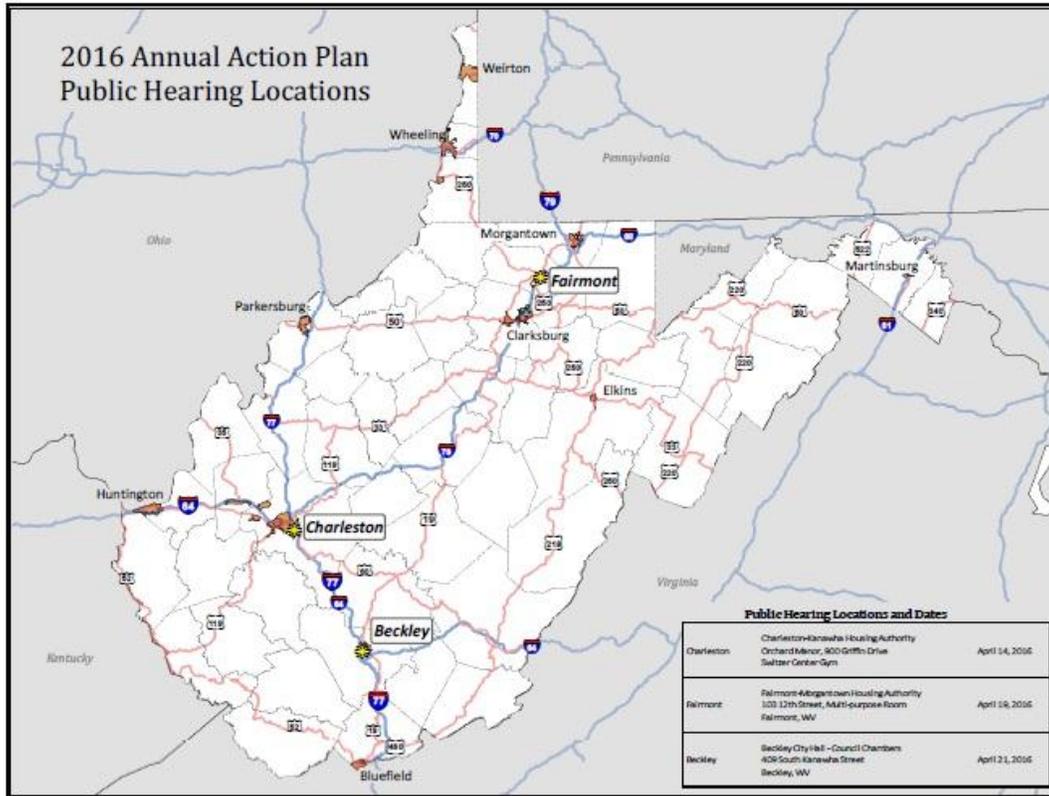
In addition to the above outcomes, the CDBG program implemented the following with plans to continue to build upon such activities:

- 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, 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 2014.
- Section 3: In anticipation of proposed revised Section 3 regulations, the WVDO and the WVHDF focused on Section 3 training.
- Environmental Review: The WVDO continues to implement 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

In developing the annual Action Plan, the WVDO, WVHDF and WVOEO 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 (CoC's) and other interested parties through outreach efforts. This draft plan will be published on the West Virginia Department of Commerce's website on April 4, 2016 and will be widely distributed via email and in hard copies as outlined in the plan upon request. The State encourages all citizens to participate in the planning process. Accommodations are made for non-English speaking persons and persons with mobility, visual, or hearing impairments as needed.

Three public hearings have been publicized at least 10 days in advance in all major newspapers across the state and by postings, email, and online. The first hearing will be on April 14, 2016 to obtain citizens' views about housing, homelessness, public facilities and services and non-housing community development needs in the state as directed by the approved citizen participation plan. The public is invited to submit written comments to the plan with the conclusion of the comment period on May 6, 2016.



Action Plan Public Hearing Sites

5. Summary of public comments

The State received a variety of comments regarding the various programs during the public hearings as well as submitted during the comment period.

Refer to Citizen Participation Chart for an overview of all comments, including the verbal comments and written comments submitted by citizens during the public meeting process.

There were several administrative questions regarding the different programs including application deadlines, eligibility of applicants and program participants, and how to access or participate in certain programs. There was also additional information and clarification on some specifics of the programs provided to staff at organizations who are utilizing the programs at the local level or referring clients to programs to ensure understanding of program parameters.

Specific to the CDBG program, there were several questions regarding what sort of projects are primarily funded, with the State providing explanation that the majority of projects are water and sewer infrastructure projects, given the need in the state. There were comments indicating that other community development projects could greatly benefit from CDBG funding, with perhaps less focus from the State on water and sewer infrastructure. There was also discussion of the revised Section 3 regulations.

There was praise from several commenters of the HOME programs; both from those who provide the programs on the local level, as well as participants from the programs that have been able to afford to purchase a residence only because of the programs. There were several comments regarding increasing funding for the HOME mortgage programs including keeping all of the program income the HOME program generates within the HOME mortgage programs. There were comments about how successful these programs are, and that they could be even more successful with additional funding provided. The impact on the low income residents of the state was emphasized.

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 the public hearing as well as written comments provided via comment form.

7. Summary

WVDO, WVHDF, and WVOEO 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 annual Action Plan, the WVDO, WVHDF and WVOEO 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 throughout the state for public participation, along with written comments received during the comment process.

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 Development Office
HOPWA Administrator	WEST VIRGINIA	West Virginia Office of Economic Opportunity
HOME Administrator	WEST VIRGINIA	West Virginia Housing Development Fund
ESG Administrator	WEST VIRGINIA	West Virginia Office of Economic Opportunity

Table 1 – Responsible Agencies

Narrative

The West Virginia Department of Commerce, Development Office is the lead agency and administers the CDBG grant covered by the Consolidated Plan. There are three separate agencies that administer the four key programs included in the HUD Consolidated and annual Action Plan. The WVDO organized and implemented planning activities to include key contacts in the development of the plan.

Consolidated Plan Public Contact Information

Agency Role	Name	Department/Agency
CDBG Administrator	Kelly Workman	West Virginia Development Office
HOPWA Administrator	Kasie Ray	West Virginia Office of Economic Opportunity
HOME Administrator	Catherine Colby	West Virginia Housing Development Fund
ESG Administrator	Kasie Ray	West Virginia Office of Economic Opportunity

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 a public hearing and made the draft 2016 annual Action Plan available for comment as guided by the State's Citizen Participation Plan. The draft plan was also posted to the West Virginia Development Office website for comment.

As required by the Citizen's Participation Plan, the partner agencies (WVDO, WVHDF and WVOEO) distributed information about the planning process and sought to engage involvement from a wide constituency of people, especially participation from low and moderate income people, people living in slum and blighted areas and in areas where CDBG, HOME, 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. Plans continued to be distributed throughout the state through the four continuums of care that reach nonprofit homeless service providers.

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. The WVOEO in consultation with the 4 CoC's in the state act as a conduit for leading the process of identifying barriers and strategies for addressing the needs of those experiencing homelessness and at risk of becoming homeless. Additional work through the West Virginia Interagency Council on Homelessness (WVICH) provides for substantial information through working committees targeting specific sub-populations experiencing homelessness. The WVICH population focused subcommittees consist of chronic homelessness, Veterans, families, children and youth, aging and special populations.

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 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. WVOEO requires that all recipients of ESG funds participate in the annual Point in Time and Shelter count. All recipients of funding are required to be active members in the CoC which covers the provider’s service area and to participate in that CoC’s coordinated assessment process. Coordination is also accomplished through West Virginia’s participation in two national initiatives committed to ending chronic homelessness and Veterans homelessness: Mayor’s Challenge and Zero 2016.

In 2013, the West Virginia’s Governor, Earl Ray Tomblin, issued an Executive Order to revitalize the WVICH. The Council is charged with the development and implementation of a plan to prevent and end homelessness in the State. The WVICH adopted the national strategies and worked diligently through a variety of working committees previously mentioned targeting specific sub-populations to address the needs of persons experiencing homelessness, including chronically homeless individuals and families, families with children, veterans, and unaccompanied youth and persons at risk of homelessness.

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 WVOEO coordinates with partners in the 4 CoC’s 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 WVOEO annually. Applications are emailed to past ESG funding recipients and all CoC leads for information distribution. Applications are also available through the WVOEO website for any new applicants wishing to apply. Applications are reviewed based on application of eligible activities and ability to meet performance and compliance objectives. During the review process, all four CoC's 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.

Policies and procedures for HMIS: The 4 CoC's 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. WVOEO is a member of the statewide HMIS steering committee.

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

See Chart on following pages

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Region I Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region II Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region III Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region IV Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region V Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region VI Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region VII Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region VIII Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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	Agency/Group/Organization	Region IX Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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.

10	Agency/Group/Organization	Region X Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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.
11	Agency/Group/Organization	Region XI Planning and Development Council
	Agency/Group/Organization Type	Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 an application and training conference, 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.
12	Agency/Group/Organization	RELIGIOUS COALITION FOR COMMUNITY RENEWAL
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
13	Agency/Group/Organization	CENTRAL APPALACHIA EMPOWERMENT ZONE OF WEST VIRGINIA CORPORATION
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.

14	Agency/Group/Organization	Change, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
15	Agency/Group/Organization	NORTH CENTRAL WV COMMUNITY ACTION
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
16	Agency/Group/Organization	Mountain Opportunities Corporation
	Agency/Group/Organization Type	Housing Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
17	Agency/Group/Organization	Community Action of South Eastern WV (CASE)
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
18	Agency/Group/Organization	ALMOST HEAVEN HABITAT FOR HUMANITY, INC.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Habitat for Humanity
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.

19	Agency/Group/Organization	COALFIELD DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Housing Services - Housing Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
20	Agency/Group/Organization	COMMUNITY RESOURCES, INC.
	Agency/Group/Organization Type	Housing Services - Housing Mortgage Loan Originator for the NewHOME Program; Community Action Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
21	Agency/Group/Organization	FAIRMONT COMMUNITY DEVELOPMENT PARTNERSHIP
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
22	Agency/Group/Organization	KANAWHA INSTITUTE FOR SOCIAL RESEARCH & ACTION
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
23	Agency/Group/Organization	MOUNTAIN CAP OF WEST VIRGINIA, INC.
	Agency/Group/Organization Type	Housing Services - Housing Community Action Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.

24	Agency/Group/Organization	MOUNTAINEER DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
25	Agency/Group/Organization	RANDOLPH COUNTY AFFORDABLE HOUSING
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
26	Agency/Group/Organization	SOUTHEASTERN APPALACHIAN RURAL ALLIANCE, INC.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
27	Agency/Group/Organization	SO. APPALACHIAN LABOR SCHOOL
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
28	Agency/Group/Organization	STOP ABUSIVE FAMILY ENVIRONMENTS
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.

29	Agency/Group/Organization	PRIDE COMMUNITY SERVICES, INC.
	Agency/Group/Organization Type	Housing Services - Housing Community Action Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
30	Agency/Group/Organization	ARC OF HARRISON COUNTY
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
31	Agency/Group/Organization	Parkersburg Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
33	Agency/Group/Organization	HUNTINGTON HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
34	Agency/Group/Organization	MINGO COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Mortgage Loan Originator for the NewHOME Program
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
35	Agency/Group/Organization	Fairmont/Morgantown Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Education Mortgage Loan Originator for the NewHOME Program
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME Department.
36	Agency/Group/Organization	West Virginia Community Action Partnership
	Agency/Group/Organization Type	Community Action Association
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	On-going communication and consultation with the Association to improve coordination and service delivery by Community Action Network

37	Agency/Group/Organization	West Virginia Interagency Council on Homelessness
	Agency/Group/Organization Type	Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Quarterly Council meetings and intermittent working committee meetings along with on-going communication as needed working to improve or create and implement policies regarding homeless issues
38	Agency/Group/Organization	Kanawha Valley Collective (KVC)
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Periodic consultation to ensure compliance for participating organizations and improved policy regarding regulations and statewide implementation of strategies
39	Agency/Group/Organization	West Virginia Coalition to End Homelessness
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Periodic consultation to ensure compliance for participating organizations and improved policy regarding regulations and statewide implementation of strategies

40	Agency/Group/Organization	Greater Wheeling Coalition for the Homeless
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Periodic consultation to ensure compliance for participating organizations and improved policy regarding regulations and statewide implementation of strategies
41	Agency/Group/Organization	Cabell Huntington Wayne Continuum of Care
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Periodic consultation to ensure compliance for participating organizations and improved policy regarding regulations and statewide implementation of strategies
42	Agency/Group/Organization	CHARLESTON KANAWHA HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation regarding programs and services provided to residents of public housing. Joint event at public housing authority office to discuss draft annual action plan and residential programs and services.
43	Agency/Group/Organization	West Virginia University Land Use and Sustainable Development Law Clinic
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation regarding new initiatives concerning land use, planning, zoning and related initiatives in communities throughout the State of West Virginia.
44	Agency/Group/Organization	West Virginia Division of Financial Institutions
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Financial Regulatory Agency
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Review of financial institutions in the State of West Virginia, and review of any incidences of redlining among the institutions.
45	Agency/Group/Organization	West Virginia Land Stewardship Corporation
	Agency/Group/Organization Type	Other government - State Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation included a review of redevelopment initiatives, accomplishments and challenges associated with the adaptive reuse of idle or abandoned property.
46	Agency/Group/Organization	West Virginia Association of Realtors
	Agency/Group/Organization Type	Housing Service-Fair Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Professional Association
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation concerning code of conduct, and fair housing and diversity training for West Virginia real estate professionals.
47	Agency/Group/Organization	West Virginia Real Estate Commission
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Real Estate
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation concerning fair housing and diversity continuing education, and any fair housing issues or complaints.
48	Agency/Group/Organization	West Virginia Human Rights Commission
	Agency/Group/Organization Type	Service-Fair Housing Other government - State

	What section of the Plan was addressed by Consultation?	Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation concerning collaboration on fair housing programs and services, challenges within the State of West Virginia related to the Analysis of Impediments.
49	Agency/Group/Organization	GARRETT COUNTY COMMUNITY ACTION COMMITTEE, INC.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Continuous and ongoing consultation with HOME Program participants strengthens the outreach of the WVHDF HOME 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		
Interagency Council on Homelessness 10 Year Plan	WV Department of Health and Human Resources	Policy development and implementation to remove barriers to housing for low income individuals and families as well as enhancing opportunities for those experiencing housing crisis situations and reaching all eligible participants including those with special needs

Table 3 - Other local / regional / federal planning efforts

Narrative

No additional narrative needed

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 2016 Action Plan was developed with public input as per the State's Citizen Participation Plan published February 26, 1996 and updated May 1, 2007. This draft plan was published on the WVDO's website on April 4, 2016 and will be widely distributed via email and paper copy as requested. Three public hearings were scheduled for April 14th in Charleston WV, April 19th in Fairmont, WV and April 21st in Beckley, WV. There was a 30 day comment period following the availability of the plan.

Citizen Participation Outreach

See Chart on following pages

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	22 people attended the Public Hearing. There were six questions pertaining to the programs and were answered during the hearing.	1. Q. Jeff Knight of Charleston Kanawha Housing ask Ms. Workman to repeat that WVDO only receives \$12M in funding, however over \$65M in applications were received and if they were all infrastructure projects and what type of water and sewer projects were approved? A. Ms. Workman explained other community improvement requests were received; however, all of our funding sources were allocated for water and/or sewer line	N/A	

				<p>extensions or improvements on existing lines. Mr. Knight mentioned a comment from the media that Secretary Castro said States and Entitlements spend too much money on water and sewer infrastructure. Ms. Workman emphasized that the State of WV has such a critical need for water and sewer and will remain a priority for CDBG at this time. 2. Q. Terry Martin from Region III Planning and Development Council made a statement agreeing to work together early in the process to ensure</p>	
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				<p>compliance with Section 3 and make each contractor certify with their bid that they are on HUD's registry. A. Ms. Workman explained that the contractor must be eligible as defined by HUD. WVDO has Section 3 documents within its application and if they are not complete, the bid is not eligible. 3. Q. Ms. Workman asked if CKHA had a good participating rate for the Family Services? A. Serena Joslin replied that the participation was increasing. 4. Q. Mark Taylor inquired when does WVDO submit Section 3 reports?</p>	
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				<p>A. August, however HUD's system has been down for two years.5. Q. An unidentified attendee asked Dana Williams if a tenant wants to participate in the Homeownership Program through the Self Sufficiency Program, how do they get financing?</p> <p>A. RCCR will help with the lender and the mortgage may be subsidized. 6 Q. Cathy Colby asked Dana Williams what is the matching source for the escrow accounts under the Self Sufficiency Program? A. Mark Taylor answered it was part of Section 8.</p>	
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2	Public Hearing	Non-targeted/broad community	<p>Nine people attended the Public Hearing. There were two questions pertaining to the programs and were answered during the hearing.</p>	<p>1. Christal Crouso of the Fairmont-Morgantown Public Housing Authority (FMPHA) commented that she is disappointed that it is difficult to get CDBG funds committed to city-based rehabilitation projects because of such a need. She did add later that her sentiments were not directed at the WVDO because the WVDO works with non-entitlement cities within the program's definitions and Fairmont and Morgantown are entitlement cities. Ms. Workman expressed her concerns with Ms.</p>	N/A	
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				<p>Crouso, adding it is difficult balance to maintain of where to direct funds and the WVDO has taken the lead of the governor in giving priority to water and sewer projects for the health and environmental benefits for many underserved areas in a predominately rural state. Ms. Workman encouraged Ms. Crouso to continue to consider the CDBG program for community development projects. Ms. Crouso also commented to Ms. Colby that she would hope more program generated</p>	
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				<p>income from the HOME programs would be steered toward the Homeownership program because of the effectiveness of those funds in projects in her area. Ms. Colby complimented the Fairmont-Morgantown Public Housing Authority for its effectiveness in keeping people moving through the pipeline. 2. Theresa Nichols, also of the FMPHA, asked Ms. Ray for more information and clarification about the two WVOEO programs discussed, ensuring that she is sending referrals to the most suitable</p>	
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				agency for assistance		
3	Public Hearing	Non-targeted/broad community	Nine people attended the Public Hearing. There were five questions pertaining to the programs and were answered during the hearing.	1.Q. Jill Moorefield with the City of Beckley-is HOME for low income? A.Cathy Colby of WVHDF answered yes for 80% and below. 2. Q. Angela King-What about communities that do not have staff to run the program or submit the application for CDBG funding? A. Kelly Workman-If the community has a Mayor, they would be eligible, if not, the county could be the applicant. The applicant would work closely with Regional Planning and Development Councils. Raleigh	N/A	

				<p>County is in Region One. 3. Q. Bob Cary-Could Beckley apply on behalf of a community if they are located outside the city limits of Beckley? (Extending Beckley Water Company service to Mabscott) A.Kelly Workman-Yes, we would consider the application based on the area being served. 4. Q. Jill Moorefield-When is the deadline for ESG? A. Kasie Ray-The deadline for the 2016 funding cycle has passed. The deadline for 2017 funds will be in the notice of funding, announced in January/February. 5.Q. Christine</p>	
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				<p>Kinder of WVSU NRGRDA-What are some examples of other CDBG projects and if we do not have a water project, would you say it is not worth it to apply? A.Kelly Workman-In 2009, the program funded some demo projects. Streetscape projects have also been done in the past. However, there is such an urgent need for water and sewer and that is our program priority. WVDO always encourages applications for other project needs. The application process is a lot of work and</p>	
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				is the applicant's decision if they want to invest the time in the application. Applicants may look at past years to see the types of projects that received funding.		
4	Public Comment Form	Non-targeted/broad community	This public comment was submitted via the Public Comment Form from Al Wiggins, from ARC Harrison County. The WVHDF responded by stating \$400,000 has been set aside for families earning at or below 80% AMI for the county of residence. Applicants must meet underwriting criteria as set forth in the NewHOME procedural guide.	The commenter requested 400k be set aside for people with intellectual developmental disabilities, stating his organization has buyers ready with more in the pipeline.	N/A	

5	Public Comment Form	Residents of Public and Assisted Housing	<p>This public comment was submitted via the Public Comment Form from John Martys, Director, of the Fairmont-Morgantown Public Housing Authority. The WVHDF responded via letter explaining the WVHDF's role in administering the HOME funds, as well as the general purpose and objectives of the HOME programs. The letter addresses the \$1,531,000 in funding for the NewHome Loan program which matches the 2015 funding amount, also stating its the second largest funded program. The letter discusses program income and administrative funds, emphasizing that</p>	<p>Under the HOME Program, the following items are suggested:</p> <ol style="list-style-type: none"> 1. Increase the allocation to Single Family Loan Program. 2. Keep program proceeds in Single Family Program. 3. Provide Funds to Housing Counseling Programs. 4. Do not use HOME for LIHTC Program. 5. Consider subrecipient agreements with high performing partners. 	N/A	
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			<p>when unplanned HOME program income is received (project deobligation, house pay off, foreclosure etc.) the funds are historically directed to the NewHOME loan program. The letter clarifies that housing counseling programs are not an eligible use of HOME funds per regulation. The response discusses the HOMERent Program and the application process, but justifies the necessity of the LIHTC program. Finally, the response states that there has been a 20% decrease in the HOME award from 2012-2016 and therefore use of subrecipient agreements is an</p>			
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			unviable consideration.			
6	Public Comment Form	Residents of Public and Assisted Housing	<p>This public comment was submitted via the Public Comment form Christal Crouso, of the Fairmont-Morgantown Public Housing Authority. The WVHDF responded via letter explaining the WVHDF's role in administering the HOME funds, as well as the general purpose and objectives of the HOME programs. The letter went on to explain the funding of the various HOME programs including administrative funds and the utilization of program income. The letter stated that while the NewHOME program did not increase, it is the second largest funded</p>	<p>The HOME Single Family Mortgage Program continues to be the best affordable lending program for the poorest residents of WV. Please increase the allocation of the Single Family Mortgage Program to include all Program Income.</p>	N/A	

			<p>program and that when unplanned HOME program income is received (project deobligation, house pay off, foreclosure etc.) the funds are historically directed to the NewHOME loan program.</p>			
7	Public Comment form	Non-targeted/broad community	<p>This public comment was submitted via the public comment form from Brent and Christina Boggess. The WVHDF responded via letter explaining the WVHDF's role in administering the HOME funds, the general purpose and objectives of the HOME programs and the current funding of \$1,531,000 for the 0% interest direct loan under the NewHOME program, as well as</p>	<p>The Boggess family used the HOME program to purchase a residence. They commented on how important the program is to families, giving them a chance to have a home for their children. Without the program, they would not have that opportunity. The program is a blessing for their</p>	N/A	

			<p>thanking them for their interest and participation in the 2016 Action Plan.</p>	<p>family and is great for the community. Without the HOME program, families would not have a chance to purchase a residence due to income and credit limitations.</p>		
8	Public Comment Form	Residents of Public and Assisted Housing	<p>This public comment was submitted via the public comment form from Amy Hammond of the Fairmont/Morgantown Housing Authority. The WVHDF responded via letter explaining the WVHDF's role in administering the HOME funds, as well as the general purpose and objectives of the HOME programs. The letter goes on to explain the funding amount for the 0% interest direct loan</p>	<p>Increase HOME program funds for more mortgage program opportunities for low income families. Funding decline in the HOME program would be a big factor in economic decline for the entire state. Program income generated should stay with the HOME program for continuation of affordable housing. Without the</p>	N/A	

			<p>NewHOME program of \$1,531,000 which matches the 2015 funding amount. It goes on to explain that when that when unplanned HOME program income is received (project deobligation, house pay off, foreclosure etc.) the funds are historically directed to the NewHOME loan program.</p>	<p>program, low income families may not have the opportunity to purchase a home.</p>		
9	Public Comment Form	Persons with disabilities	<p>This public comment was submitted via the public comment form from Felicia Cavallier. The WVHDF responded via letter explaining the WVHDF's role in administering the HOME funds, the general purpose and objectives of the HOME programs and the current funding of</p>	<p>This commenter stated she is handicapped and praised the HOME 0% interest loan program stating it was like a "light at the end of the tunnel", allowing her to purchase a handicap-accessible home. Without the program, she stated she would</p>	N/A	

			\$1,531,000 for the 0% interest direct loan under the NewHOME program, as well as thanking them for their interest and participation in the 2016 Action Plan.	not be able to afford such a home.		
10	Public Comment Form	Residents of Public and Assisted Housing	This comment was received via Public Comment form from Theresa Nichols of the Fairmont-Morgantown Housing Authority.	Requested additional funding for the NewHOME Loan Program. As a housing counselor, she has helped many families overcome obstacles to become home-buyer ready. Many of these families would not be able to qualify for a conventional loan. She requested more funding for the program so she could continue to provide opportunities to make	N/A	

				homeownership possible for low-income families who continue to pay too much for rent.		
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The State of West Virginia receives HUD funding for CDBG, HOME, ESG and HOPWA programs in the amount of \$18,008,984 million. All funds will be used strategically to address priority needs and leverage other federal, state and local resources.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	12,520,351	0	0	12,520,351	3,751,053	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	3,595,272	1,800,000	0	5,395,272	10,785,816	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	351,515	0	0	351,515	1,054,545	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 Reminder 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	1,541,846	0	0	1,541,846	4,625,538	Funds require 100% matching contributions. Funds are used leverage additional resources for homelessness prevention, rapid re-housing, emergency shelter operations and case management services.

Table 5 - 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 (with the exception of 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)
- Water Development Authority
- Local Lending Institutions
- Additional Funds
- Private Resources
- West Virginia Development Office
- U.S. Department of Agriculture - Rural Utilities Service, Rural Development
- Appalachian Regional Commission

HOME:

Any HOME Program match obligation incurred by the State during FY 2016 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
- Eligible Flood Program activities
- Development Financing Program (eligible multi-family project financing)

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

eligible. The State may also request match reductions during FY 2016 for any area in which a federal disaster declaration is made pursuant to the Stafford Act.

In addition, HOMErent 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 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.

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 or not subrecipients are able to reach their leveraging goals set out in their annual action plans, and whether they are utilizing a variety of available resources to serve HOPWA eligible households.

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, identified as a priority of the CDBG program, local governments may utilize publicly owned land for planned infrastructure improvements. These improvements benefit the community as a whole. Examples may include existing or acquired property that will serve as the location of a water treatment facility or wastewater treatment facility. In certain circumstances, new utility lines 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 and wastewater 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.

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
1	Development of Public Infrastructure	2015	2016	Non-Housing Community Development		CDBG Priority 2 (Facilities and Services)	CDBG: \$12,000,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1500 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Local Community Development	2015	2016	Affordable Housing		CDBG Priority 1 (Infrastructure Development) CDBG Priority 2 (Facilities and Services) CDBG Priority 3 (Job Creation) HOME Priority 1 (NewHOME Program) HOME Priority 2 (HOME Leverage Loan Program) HOME Priority 4 (HOMErent Program) HOME Priority 5 (CHDO Program) HOME Priority 6 (CHDO Oper Exp Grant Program)	HOME: \$3,595,272	Rental units constructed: 25 Household Housing Unit Rental units rehabilitated: 25 Household Housing Unit Direct Financial Assistance to Homebuyers: 18 Households Assisted
3	Job creation and retention	2015	2016	Non-Housing Community Development		CDBG Priority 2 (Facilities and Services)		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	ESG Shelter Goal 2	2015	2019	Affordable Housing Homeless Non-Homeless Special Needs		ESG need 2	ESG: \$616,738	Homeless Person Overnight Shelter: 1700 Persons Assisted
5	ESG ReHousing and Prevention Goal 1	2015	2019	Homeless Non-Homeless Special Needs		ESG Need 1	ESG: \$925,108	Tenant-based rental assistance / Rapid Rehousing: 300 Households Assisted Homelessness Prevention: 100 Persons Assisted
6	Provide Suitable Living Environment HOPWA	2015	2019	Non-Homeless Special Needs			HOPWA: \$351,515	Homelessness Prevention: 240 Persons Assisted HIV/AIDS Housing Operations: 7 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Development of Public Infrastructure
	Goal Description	

2	Goal Name	Local Community Development
	Goal Description	HOME: The 2016 anticipated \$3,595,272 HOME award allocated to the State of West Virginia and the estimated \$1,800,000 of 2016 HOME Program Income are allocated 100% to Local Community Development. Local Community Development is the entire priority since HOME funds and HOME Program Income are used to expand the supply of safe, decent, sanitary, and affordable housing, and are not used for the Development of Public Infrastructure or Job Creation and Retention.
3	Goal Name	Job creation and retention
	Goal Description	
4	Goal Name	ESG Shelter Goal 2
	Goal Description	*Note - End Year below should be 2016 to reference the one year annual action plan* 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.
5	Goal Name	ESG ReHousing and Prevention Goal 1
	Goal Description	*Note - End Year below should be 2016 to reference the one year annual action plan* 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.
6	Goal Name	Provide Suitable Living Environment HOPWA
	Goal Description	*Note - End Year below should be 2016 to reference the one year annual action plan* 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.

Table 7 – Goal Descriptions

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 (%)	Local Community Development (%)	Job creation and retention (%)	ESG Shelter Goal 2 (%)	ESG ReHousing and Prevention Goal 1 (%)	Provide Suitable Living Environment HOPWA (%)	Total (%)
CDBG	100	0	0	0	0	0	100
HOME	0	100	0	0	0	0	100
HOPWA	0	0	0	0	0	100	100
ESG	0	0	0	40	60	0	100

Table 8 – Funding Allocation Priorities

Reason for Allocation Priorities

The allocation priorities are based on the priority needs identified through the citizen participation and consultation process. These funding levels are established to help the goals identified in the Consolidated Plan.

CDBG:

Development of Public Infrastructure continues to be the priority need for the CDBG funding for the State of West Virginia. Realizing that reliable infrastructure forms the basic foundation for other opportunities, the State will continue to invest 100% of the CDBG funding to develop suitable living conditions and create an environment conducive to future community and economic development.

HOME:

The 2016 anticipated \$3,595,272 HOME award allocated to the State of West Virginia and the estimated \$1,800,000 of 2016 HOME Program Income are allocated 100% to Local Community Development. Local Community Development is the entire priority since HOME funds and HOME Program Income are used to expand the supply of safe, decent, sanitary, and affordable housing in the 44 non-consortia counties, and are not used for the Development of Public Infrastructure or Job Creation and Retention.

ESG:

WVOEO allocates ESG funds annually through a competitive application process. Eligible applicants include local units of government and nonprofit organizations. 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. The majority of recipients identify rapid rehousing as a priority need in their service area. WVOEO places a focus on rapid rehousing and prevention programs as a critical piece in ending homelessness for those clients who receive the services. As research shows the effectiveness of these programs WVOEO has placed an allocation of 60% toward those types of programs while the remaining 40% is placed in the also critical intervention of emergency shelters.

HOPWA:

WVOEO allocates HOPWA funds annually through a competitive application process. Eligible applicants include local units of government and nonprofit organizations. Through this application process, WVOEO ensures that funds are allocated to applicants that:

1. Clearly state the need for the services in their area and provide data to support the need (such as HMIS data on outcomes, numbers served in the past year within a similar program, wait list data, and unmet 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.

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

CDBG: FY2015 funding cycle: WVDO received 54 applications for more than \$67 million; only estimated \$12.3 million available. Demand far exceeding the amount of funding available, it is not uncommon to receive the same applications for consecutive years. Many of these projects address serious health or environmental concerns, which the investment of CDBG funding improves; however, many residents continue to struggle with inadequate and/or unsafe water and wastewater systems which is why development of water and wastewater systems continues to be a critical need.

ESG and HOPWA: By using a highly competitive application process for all ESG and HOPWA funds the WVOEO assures the funds continue to serve those most at need. The goal of ending homelessness is met by streamlining resources in such a way to serve those hardest to reach; chronically homeless individuals and families. 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.

NewHOME Program: This program will receive 11.1% of the HOME award (\$400,000), and will provide mortgage financing for an estimated 4 families (at or below 80% AMI). This program will receive 62.8% of the estimated HOME Program Income (\$1,131,000), and will provide mortgage financing for an estimated 15 families (at or below 80% AMI).

HOME Leverage Loan Program: This program will receive 2.1% of the HOME award (\$75,000), and will provide resources to qualified families (at or below 80% AMI) in order to leverage HOME funds with another source, and thereby provide the entire financing required for a house. It is estimated that the HOME Leverage Loan Program will provide resources with which three qualified families can leverage with other sources.

HOMERent Program: This program will receive 50% of the HOME award (\$1,800,671) and an additional 27.2% of the estimated HOME Program Income (\$489,000), and will provide funds for nonprofit and for profit developers for housing opportunities for qualified families (at or below 80% AMI). It is estimated that 42 families will be served from the HOMERent Program.

Community Housing Development Organizations (CHDO) Program: This program will receive 22.2% of the HOME award (\$800,000), and will provide CHDOs funds for the development of housing opportunities for qualified families (at or below 80% AMI). It is estimated that 8 qualified

families in the State will be served from the CHDO Program.

CHDO Operating Expense Grant Program: This program will receive 4.4% of the HOME award (\$160,074), will provide grant funds for certified CHDOs so that a portion of a CHDO's operating expenses can be reimbursed. It is estimated that 8 certified CHDOs will benefit from this program.

Administration: This program will receive 10% (\$359,527) of the HOME award and 10% of HOME Program Income (estimated to be \$180,000), and be used by the WVHDF in the administration of the HOME Program.

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, the identification of local priorities, and making investment 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.

Distribution Methods

Table 9 - Distribution Methods by State Program

1	State Program Name:	CDBG
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	<p>An activity may be funded in whole or in part with CDBG funds only if all of the following criteria are met:</p> <ol style="list-style-type: none"> 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. 2. Each activity must fulfill one of the three national objectives. 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. <p>All units of local government in non-entitlement areas of the State may apply for CDBG funding.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>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: (1) the relationship to a national objective and number of low- and moderate-income persons served, (2) the relationship to CDBG program design objectives, (3) the public health, environmental, and economic development benefits of the project, (4) the degree to which the project will correct identified deficiencies or achieve compliance with required standards, (5) the cost effectiveness of the project, (6) the availability of other sources of funding for the project, (7) the degree to which the project achieves state, regional, and local planning goals, (8) the readiness of the project to proceed, if funded, and (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>Upon the receipt of an application for CDBG funding, the following criteria will be emphasized during the review process:</p> <ol style="list-style-type: none"> 1. Existing open grants that are not proceeding according to the timeframe established in the grant agreement. 2. Readiness of the project to proceed. 3. Commitment of all other funding sources. <p>For example, 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 of the other review criteria.</p> <p><u>IJDC Review (Water, Wastewater, and Economic Development):</u> Upon receipt of an application, a technical evaluation and review will be conducted by the WVDO to</p>
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		<p>include consultation with relevant local, regional, state, and federal agencies, including those of the Infrastructure and Jobs Development Council (IJDC).</p> <p>The intent of this review is to assess and clarify statements of community development and housing needs and needs of low- and moderate-income persons; assess applicant's 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 determined not to be eligible or not to fulfill a national objective shall be removed from funding consideration and the applicant so notified. No action shall be taken inconsistent with the recommendations of the IJDC.</p>
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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>The current CDBG application and instruction forms are available on the WVDO website. 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 paper or electronic copy.</p> <p>Also, the WVDO provides a Policies and Procedures Manual. The purpose of the Policies and Procedures Manual is:</p> <ul style="list-style-type: none"> • To assist grant recipients in the administration of CDBG 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. <p>The manual is intended as a guide, not as a substitute for a thorough knowledge of state and Federal laws and regulations referenced in this manual. 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.</p> <p>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 www.wvdo.org.</p>
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<p>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)</p>	<p>Not applicable here.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable here.</p>

<p>Describe how resources will be allocated among funding categories.</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"> 1. <u>Water and Wastewater Projects</u>: Applications must be postmarked by May 23, 2016. No application for water or wastewater may be submitted without an IJDC determination letter. The WVDO may accept an application on a provisional basis, provided that the project is submitted to IJDC prior to May 10, 2016. The IJDC letter must be submitted to WVDO by July 27, 2016. Projects submitted to IJDC after May 10, 2016, will not be considered. 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. 2. <u>Job Creation Projects</u>: 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. 3. <u>Other Community and Economic Development Projects; such as Planning Projects and General Community Development</u>: Applications must be postmarked by May 23, 2016. 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.
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<p>Describe threshold factors and grant size limits.</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 2012 or earlier program years that have not received an interim closeout. (2) Jurisdictions having active grants from the FY 2013 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 2016 "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 2016 program, be advised that letters will be mailed in September 2016 indicating that projects funded in FY 2014 or earlier that have not entered into construction contracts by December 31, 2016, may have all funds recaptured as of January 15, 2017.</p> <p><u>Grant size limits:</u> Water and Wastewater projects \$1,500,000, Job Creation projects \$1,250,000, other Community and Economic Development projects; such as Planning Projects \$100,000 or \$120,000 for a Joint Planning Project, and General Community Development \$500,000.</p> <p>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</p>
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		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 project if the problematic project was based upon job creation or retention, the director 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 granted.
	What are the outcome measures expected as a result of the method of distribution?	<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 State’s goals as outlined previously. 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 3,000 households.</p>
2	State Program Name:	ESG
	Funding Sources:	ESG

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>WVOEO 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. WVOEO allocates ESG funds through a competitive application process.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<ol style="list-style-type: none"> 1. All applications must be submitted before the deadline to be considered for review. 2. 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. 3. All applications that meet the standards outlined in 1 and 2 above will be scored and evaluated by a review team comprised of WVOEO staff. 4. Each question in the narrative is worth 10 total points and will be scored by component. Each component must receive 70% of the points to be considered for funding. Each appendix is worth 5 points. Budget/Outcome forms are worth 50 points each. Budget/Outcome forms must receive 70% of the points for the application to be considered for funding. 5. One point will be given to all applicants from non-entitlement areas in accordance with the WV consolidated plan. 6. Points may be deducted for compliance issues for applicants who have had the grant in the previous years
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable here</p>

<p>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)</p>	<p>WVOEO 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. To receive ESG funds, a jurisdiction needs to submit its Consolidated Plan at least 45 days before the start of its program year.</p> <p>The State prepares a competitive grant application that is distributed to all interested parties, CoC's and posted on the WVOEO website. Training and technical assistance calls are held to guide potential applicants through the application process. At the end of the application period, all complete eligible applications are reviewed by a team of WVOEO staff and a risk assessment is performed for each applicant. All applicants must score a minimum of 70% in each requested component to receive funding. The risk assessment results are taken into consideration when determining funding decisions and applying possible additional conditions on an award.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable here.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The State of WV 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>

	<p>Describe threshold factors and grant size limits.</p>	<p>WVOEO does not assign threshold factors. 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.</p>
	<p>What are the outcome measures expected as a result of the method of distribution?</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 1200 individuals through ESG activities – rapid rehousing, prevention and emergency overnight shelter.</p>
<p>3</p>	<p>State Program Name:</p>	<p>HOME</p>
	<p>Funding Sources:</p>	<p>HOME</p>
	<p>Describe the state program addressed by the Method of Distribution.</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 construction and rehabilitation of rental units; provide operating expense grants to CHDOs; and allow the State to administer the HOME Program for the forty-four non-consortia counties in the State.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p><u>NewHOME and HOME Leverage Loan Programs:</u> The criteria to be considered during the review will include: (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><u>HOMERent Program:</u> The criteria to be considered during the review will include: 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.</p> <p><u>CHDO Program:</u> The criteria to be considered during the review will include: 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.</p> <p><u>CHDO Operating Expense Grant Funds:</u> The criteria to be considered during the review will include: Need for Grant Program; Feasibility of the proposed HOME-assisted CHDO set-aside project; Capacity to complete HOME CHDO project(s) in a timely manner; Experience and qualifications of paid employees; Timeliness and accuracy of past draw submissions; and Utilization rate of previous operating expense awards</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable here</p>

<p>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)</p>	<p>Not applicable here</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Not applicable here</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p><u>NewHOME Program</u>: will provide mortgage financing for qualified families (at or below 80% AMI) to purchase a home.</p> <p><u>HOME Leverage Loan Program</u>: provide resources to qualified families (at or below 80% AMI) in order to leverage HOME funds with another source, and thereby provide the entire financing required to purchase a house.</p> <p><u>HOMERent Program</u>: will provide funds for nonprofit and for profit developers for the development of rental housing opportunities for qualified families (at or below 80% AMI).</p> <p><u>Community Housing Development Organizations (CHDO) Program</u>: will provide CHDOs funds for the development of housing opportunities for qualified families (at or below 80% AMI).</p> <p><u>CHDO Operating Expense Grant Funds</u>: will provide grant funds for certified CHDOs so that a portion of a CHDO's operating expenses can be reimbursed.</p> <p><u>Administration</u>: will be used by the West Virginia Housing Development Fund in the administration of the HOME Program for the forty-four non-consortia counties in the State</p>
<p>Describe threshold factors and grant size limits.</p>	<p><u>NewHOME Program</u>: funding per house is limited to Existing Housing Price Limits and New Housing Price Limits for the State of West Virginia HOME Homeownership Value Limits.</p> <p><u>HOME Leverage Loan Program</u>: funding per award is limited to \$25,000.</p> <p><u>HOMERent Program</u>: funding per award is limited to \$1,000,000 and must comply with the HUD maximum per unit subsidy limit.</p> <p><u>Community Housing Development Organizations (CHDO) Program</u>: funding is limited to the HUD maximum per unit subsidy limit for all units in the project.</p> <p><u>Administration</u>: funding is limited to 10% of the annual HUD HOME allocation that the State receives.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p><u>NewHOME Program</u>: as a result of the method of distribution, the outcome measure is 18 single family houses.</p> <p><u>HOME Leverage Loan Program</u>: as a result of the method of distribution, the outcome measure is providing funds to leverage additional funds for the purchase 3 single family houses.</p> <p><u>HOMERent Program</u>: as a result of the method of distribution, the outcome measure is 42 rental units.</p> <p><u>CHDO Program</u>: as a result of the method of distribution, the outcome measure is 8 rental units.</p> <p><u>CHDO Operating Expense Grant Program</u>: as a result of the method of distribution, the outcome measure is anticipated to provide operating expense grants to 8 CHDOs.</p> <p><u>Administration</u>: as a result of the method of distribution, the outcome measure is to provide the state with the funds necessary to operating the HOME Program for the forty-four non-consortia counties.</p>
4	<p>State Program Name:</p>	<p>HOPWA</p>
	<p>Funding Sources:</p>	<p>HOPWA</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>WVOEO manages the HOPWA program for the State of West Virginia. WVOEO 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>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<ol style="list-style-type: none"> 1. All applications must be submitted before the deadline to be considered for review. Any application received after the deadline will not be reviewed. 2. If all applicable sections of the application are not completed, the application will not be scored. 3. All applications that meet the standards outlined above will be scored and evaluated by a review team comprised of WVOEO staff. 4. Each question in the narrative is worth 10 total points and will be scored by component. Each component must receive 70% of the points to be considered for funding. 5. Each appendix is worth 5 points. 6. Budget/Outcome forms are worth 50 points each. Budget/Outcome forms must receive 70% of the points for the application to be considered for funding. 7. Points may be deducted for compliance issues for applicants who have had the grant in the previous years.
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable here.</p>
<p>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)</p>	<p>Not applicable here.</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>WVOEO 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 WVOEO staff and a risk assessment is performed for each eligible applicant. All applicants must score a minimum of 70% in each requested component to receive funding. The risk assessment results are taken into consideration when determining funding decisions and applying possible additional conditions on an award.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>WVOEO 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>
<p>Describe threshold factors and grant size limits.</p>	<p>WVOEO does not assign threshold factors. 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.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</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. Continued operation of the community residences will stably house up to 7 households per year.</p>

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.
- Grant Anticipation Notes (GANS): Due to the WVDO efforts to improve our 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.
- Waiver for Federal Disaster Provision: Upon a federal disaster declaration by the Federal Emergency Management Agency, the Governor may allocate up to 100 percent of any funds not obligated toward disaster relief and waive any requirement not required by law or regulation

AP-35 Projects – (Optional)

Introduction

CDBG: The State currently has one planned project for 2016 that focuses on decommissioning a public service district sewer treatment facility and redirecting treatment to another facility which improves and protects the communities' water system.

HOME: The HOME Program does not identify specific projects requiring HOME funds. However, the WVHDF HOME Department issues RFPs for nonprofit and for-profit developers to request HOME funds in order to develop a project.

ESG and HOPWA: 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. WVOEO 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	Colfax Public Service District

Table 10 – Project Information

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

Funding priorities remain unchanged for this program year. 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 situation; however, many residents continue to struggle with inadequate and/or unsafe water and wastewater system. Realizing that infrastructure development forms the basic foundation for other opportunities, the WVDO will continue to invest in viable/impactful projects to develop suitable living conditions and create an environment conducive to community and economic development in low- to moderate-income areas.

Specific obstacles to meeting underserved 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

Table 11 – Project Summary

1	Project Name	Colfax Public Service District
	Target Area	
	Goals Supported	Development of Public Infrastructure Local Community Development
	Needs Addressed	CDBG Priority 1 (Infrastructure Development)
	Funding	CDBG: \$1,261,306
	Description	This project will enable the Marion County Commission to decommission the existing Colfax Public Service District sewer treatment plant and redirect treatment to the Kingmill treatment facility. The project utilizes a regional approach to the provision of critical public services, and protects water sources and public water intakes serving nearby communities.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 280 residents will benefit from this project. In addition, surrounding communities will benefit through the provision of public services and the protection of water sources.
	Location Description	The project is located in the Colfax public service district area of Marion County, West Virginia.
	Planned Activities	This \$2.1 million project will allow the Colfax Public Service District to decommission its wastewater treatment plant; and extend the Colfax sewage system to the Kingmill Valley Public Service District, benefitting a total of 230 households. This project promotes a regional approach to the provision of critical public services and eliminated duplication of treatment facilities. The project will protect public water sources by halting overflow into the Tygart Valley River in an area upstream from the public water intake serving the Town of Monongah and the City of Fairmont.

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.

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 Development Program Priority: The State will not refuse to award funds on the basis of 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 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 in order 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 2016 Action Plan aims to serve any geographic area of the State of West Virginia that expresses need, with the exception of HOME funds, which are limited to the forty-four (44) non-consortia counties of the State. HOME funds will not be made available in the counties of Berkeley, Brooke, Cabell, Hancock, Jefferson, Kanawha, Marshall, Morgan, Ohio, Wayne, and Wood, each of which is part of a HOME consortium.

Investing across a large and diverse area is challenging; however WVDO, WVHDF, and WVOEO continue to evaluate its methods of distribution to assure that funds for these critical programs (CDBG, ESG, HOME, HOPWA) meet the priority needs within West Virginia. Each program varies in its methods for fund distribution, but as a rule WVDO, WVHDF and WVOEO give 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.

Geographic Distribution

Target Area	Percentage of Funds

Table 12 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

HOME: Funding supports projects and activities in the forty-four non-consortia counties in the State.

ESG: Funding is not allocated based on a geographic distribution method. Allocation is determined based on data supported identification of need. An extra point is given during the application process to all applicants that are proposing to serve non-entitlement areas.

HOPWA: Funding is not allocated based on a geographic distribution method. Allocation is determined based on data supported identification of need. An extra point is given during the application process to

all applicants that are proposing to serve non-entitlement areas.

Discussion

No further discussion necessary.

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 leverage loans and direct loans,
2. Community Housing Development Organizations (CHDOs) - At least fifteen percent (15 percent) of the State's allocation will be set aside for CHDO projects, and
3. HOMERent with loans to promote the improvement and creation of rental housing opportunities for low- and very low-income families. The West Virginia Housing Development Fund (WVHDF), on behalf of the State, will adjust funding levels between the program areas to recapture and reallocate funds between these program areas to reflect market demands or needs arising from natural disasters as permitted under the regulations.

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 and NewHOME 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. CHDOs, as directed by HUD, are the only direct recipients of HOME Program funding. At least fifteen (15) percent of the state's allocation will be set aside for CHDO projects.

The Fund will continue to offer leveraging opportunities during FY 2016. 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.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	66
Special-Needs	2
Total	68

Table 13 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	27
Rehab of Existing Units	25
Acquisition of Existing Units	16
Total	68

Table 14 - One Year Goals for Affordable Housing by Support Type

Discussion

With the limited HOME resources awarded by HUD to the State of West Virginia, on its own, is not enough to significantly address the affordable housing need 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 counties served by the WVHDF.

In addition, the WVHDF has participated with and established an ongoing effort with the Housing Policy Group to forward goals and efforts to facilitate affordable housing the State of West Virginia. This group is comprised of 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 WVHDF will continue to participate and work with the Housing Policy Group to facilitate efforts to accomplish goals consistent with the 2015-2019 Consolidated Plan and the housing framework created to achieve the same result.

In addition, the WVHDF continues to participate with an established ongoing effort with the “Housing Policy Group” to forward goals and efforts to facilitate affordable housing in the State of West Virginia. This group is comprised of representatives of major housing advocates and stakeholders in the development, administration and management of affordable housing resources.

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 communicates with the public housing authorities located in the forty-four non-consortia counties of the State regarding the NewHOME program, which provides mortgage financing for qualified homebuyers (at or below 80% AMI).

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

While the WVHDF 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 submit their requests for a Certification of Consistency with the Consolidated Plan to the WVHDF 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

Lack of education about the home buying process poses a barrier to affordable housing. A lack of necessary 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.

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. Jubilee Housing of the Religious Coalition for Community Renewal (RCCR), offers pre-assistance homeownership counseling to interested families. To date, 29 families have attended counseling classes.

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 through the payment of homebuyer education fees for loans funded through the NewHOME Program. 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 partners 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.

At the time of this report, there is one “troubled” Public Housing Authority in West Virginia which is located in Jackson County. While the Jackson County Housing Authority is currently listed as “troubled” in the HUD Real Estate Assessment Center (REAC), the authority has made significant changes that are expected to advance performance. The State has received information regarding the numerous organizational, management, and procedural improvements the PHA has implemented to improve operations, and subsequently status.

Through consultation with the HUD Charleston Field Office, the State will provide information concerning training that may benefit the public housing authority. The WVDO will continue to review the situation, provide resources and participate in HUD Charleston’s Community Service Roundtable. WVDO will continue to share information that may be of benefit to this public housing authority and others for the continuous improvement of performance.

The Jackson County Public Housing Authority’s leadership is actively pursuing improvement through participation in training and is on schedule to become a Standard Performer by June 30, 2017.

Discussion

No additional discussion necessary.

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 continuum of cares and the West Virginia Interagency Council on Homelessness. The WVOEO 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 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. WVOEO will aim to fund at least 5 outreach components through the 2016 application process.

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

WVOEO through the administration of the ESG grant requires all subrecipients to participate in the Point in Time count, actively participate in their CoC and coordinated assessment process. Through coordination with CoC's, 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. During the 2015 funding cycle, a mental health provider that is very active in the community and local continuum of care was awarded a street outreach grant. Thus far, the subrecipient is reporting great success in the engagement of individuals in need of services. This is one of several subrecipients that received funding for some type of street outreach services.

One Year Action: WVOEO 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 increases its probability of reaching the 1200 individuals served goal by utilizing the activities described above by actively pursuing eligible participants through all allowable

avenues.

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. WVOEO encourages the use of emergency shelters throughout the state as a critical piece of the crisis intervention. In 2015, WVOEO awarded ESG funding to 15 subrecipients to meet the emergency shelter needs of residents. WVOEO 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: WVOEO 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 on an yearly basis through the housing inventory assessment.

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 2015 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.

WVOEO 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: WVOEO 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

WVOEO is a member of the Governor appointed WV Interagency Council on Homelessness (WVICH). The council is charged to develop and implement a plan to prevent and end homelessness in the State of West Virginia. Further, the council is to serve as a statewide homelessness planning and policy development resource for the Governor and the State of West Virginia, which includes plan development that will ensure services and housing provided in an efficient, cost-effective, and productive manner. The council is also charged with developing recommendations to improve and increase access to resources and services, assist with cross-sector partnerships, develop strategies for implementation and oversight, and other similar duties. The WVICH committees address the following populations: chronic homelessness, Veterans, families, children and youth, aging and special populations. Many of the WVICH work group members represent the systems of care mentioned above i.e. healthcare, mental health etc. WVOEO allocates funding to subrecipients that identify goals to provide rapid rehousing and prevention services to the above populations.

One Year Action: Through the WVICH, a greater emphasis this year will be placed on committee work to create and revise polices as necessary to address key items above.

Discussion

The WVICH continues to work to address key issues for those experiencing homelessness in our State. Specifically, a working committee was developed to work strictly on addressing all needs of special population during the entire continuum of care process.

In addition, the WVHDF has participated with and established an ongoing effort with the “Housing Policy Group” to forward goals and efforts to facilitate affordable housing in the State of West Virginia. This group is comprised of 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 WVHDF will continue to participate and work with the Housing Policy Group to facilitate efforts to accomplish goals consistent with the 2015-2019 Consolidated Plan and the housing framework created to achieve the same result.

The WVHDF has also established a Single Family Working Group and a CHDO Working Group to openly

discuss methods of effectively addressing and meeting the needs of affordable housing for low-income families in various regions within the 44-rural county area the WVHDF serves.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	180
Tenant-based rental assistance	50
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	4
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	234

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

Introduction

The WVDO, WVHDF and WVOEO 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 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 particular barriers facing 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:

- Meet with lenders operating in the HOME program to raise awareness
- Continue to place an emphasis on the topic in homebuyer education courses

Barrier: Homeownership Education

Planned Actions:

- Support homebuyer education through the NewHOME program; paying fees for course
- Require/assist borrowers utilizing the Program to also attend homebuyer education

Barrier: Community Opposition

Planned Actions:

- Review policies/procedures to identify issues that have the potential to create obstacles to the creation/placement of affordable housing
- 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:

- Utilize the NewHOME Loan Program which includes a special provision that finances the development of single-family housing for special needs populations built in accordance with Universal Design Standards that ensure accessibility; primarily targeting households at or below 65 percent AMI
- Address the lack of specific guidance or training which explains the circumstances under which the Fair Housing Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, may require housing providers to allow applicants and tenants to use “service” and “assistance” animals.
- Enhance work with HOPWA providers and PHA's 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:

- Utilize HOME Leverage Loan Program to qualified participants to borrow up to \$25,000 at 0% interest rate with a term of ten (10) years; reduced by 10% for each year that the homebuyer occupies the housing as principal residence
- Provide forgivable loans as secondary mortgage through HOME CHDO's that develop single family housing

Barrier: Cost of Affordable Housing

Planned Actions:

- Review study by West Virginia University that centers on the costs of construction for affordable housing which could be a driver in future policy development
- 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
- 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:

- Require that all HOME assisted construction projects meet the provisions of the International Building Code (IBC)
- 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.

Purpose: to establish broad goals and policy direction related to the state's housing policy, and assist in coordination within and across public and private organizations 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 quantity and quality of West Virginia's housing stock
- Ensure that West Virginia can meet the housing needs of its senior, special needs, and homeless populations

West Virginia Interagency Council on Homelessness: The Governor appointed WVICH, of which WVOEO is an active member, is comprised of subcommittees that develop goals, strategies and objectives to end homelessness. The subcommittee on housing has outlined the following strategies:

- Work with enforcement agencies to provide outreach and training about accessibility standards, as well as stricter penalties for violations of these standards.
- Begin dialogue with service and housing providers to identify policies that are overly restrictive and other barriers.
- Examine alternative housing options, such as adult foster care, adult family care and other non-residential options.
- Develop mechanisms to reduce conflicting and restrictive policies and rules across agencies that serve persons experiencing homelessness and those at risk of homelessness.
- Establish preferences or extra points for competitive funding streams to encourage more developers to build accessible housing.

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

Planned Actions: During landlord association meetings, discuss the topic and inquire of any such reported/suspected instances. The State will produce educational information that will be distributed to publicize the existence of this issue and provide tenants with contact information for remedies available.

Discrimination within Housing Brokerage Services

Planned Action: Commit CDBG funds for fair housing testers to sample areas of the state that may have a higher frequency of issues.

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 amount 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
- Provides a point in time study for which developers can quickly research current housing trends and statistics

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 and other applicable programs

Obstacle: Ability to target projects in locations of greatest need

Planned Actions:

- Developers submitting a HOMErent or HOME CHDO application must submit a market analysis that thoroughly examines neighborhood market conditions and realistically demonstrates need for the project for which HOME 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 2016 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. At a minimum programs provide identification of hazards and participant education if such hazards cannot

be addressed by a State program.

Planned Actions:

- Conduct visual lead inspections (and physical testing) of any structure where appropriate per specific program guidelines
- Appropriate measures to remove the hazard during rehabilitation or reconstruction of homes when allowable and re-inspection of situation when required
- Ensure all program staff and organizations are properly certified to identify, test, and alleviate lead based paint hazards as required by particular programs
- Provide 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)
- Ensure 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 subrecipients 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. Subrecipients 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 NewHOME, HOME CHDO and HOMERent

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, WVHDF and WVOEO'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
- Invite PHAs to join working committees of the WVICH and others as needed
- 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

- Enhance the community of housing and anti-poverty providers by communication, cross training/education and identification of potential partnership opportunities through the WVICH

Discussion

Developable land is one of West Virginia's most valuable resources in terms of net contributions to the State's economy and tax base. However, due to its mountainous topography, the State has limited amounts of developable land in certain regions. 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.

Realizing the economic, environmental and social benefits of land use planning and zoning, as well as planned remediation and adaptive re-use of property, the State is demonstrating support of several related initiatives. The WVDO supports these efforts, and participates wherever possible to enhance collaboration among the many individuals and groups involved.

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 (WVLSA); 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 2015 program year, and will continue to be involved in supporting these important initiatives.

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 2016 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 \$25,000 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 developers of projects that include HOME funds include for profit and nonprofit developers.
- The WVHDF will use the Request for Proposals (RFP) process to solicit application for the purpose of receiving applications for requests for HOME funds.
- A thorough review will be conducted upon receipt of each RFP and subsequently ranked

according to the scoring criteria to determine funded projects.

- Eligible individuals/families receive HOME information through: a. network of nonprofits throughout the 44 non-consortia counties in the state; and b. the WVHDF website.
- For profit and nonprofit developers receive HOME information through: a. the WVHDF website; b. information received through the WVHDF HOME emails; and c. a variety of meetings that a WVHDF HOME representative attends (i.e., public hearings, FAHE meetings, and the annual WV Housing Conference).
- The WVHDF has set-aside approximately \$400,000 in the NewHOME portion of the HOME program for preference to persons with developmental disabilities.

**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
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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 resale or recapture when used for homebuyer activities:

HOMERent Program: All financial assistance provided under the HOMERent Loan program will be subject to recapture if the property is sold, transferred or no longer serves as a rental housing project prior to the expiration of the affordability period.

CHDO Rental Development Program: All financial assistance provided under the HOME CHDO Loan program will be subject to recapture if the property is sold, transferred or no longer serves as a rental housing project prior to the expiration of the affordability period.

CHDO Single Family Development 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.

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:

$$\frac{\text{Direct HOME Subsidy}}{\text{recaptured}} \times \text{Net Proceeds} = \text{HOME amount to be}$$

Direct HOME Subsidy +Homeowner Investment

$$\frac{\text{Homeowner Investment}}{\text{homeowner}} \times \text{Net Proceeds} = \text{Amount to}$$

Direct HOME Subsidy +Homeowner Investment

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.

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:

The WVDHDF employs identical recapture policies for homebuyer activity and acquisition of units. Please see the above (#2) detailed description as it is also applicable for this question as well.

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 24 CFR 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 WVOEO 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 application and monitoring process WVOEO conducts reviews of each project sponsor's written standards to ensure they are in compliance 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.

Three of the four CoC's use the VI SPDAT as the coordinated assessment. Meetings take place throughout the 3 CoC's to discuss prioritization lists and service delivery. The fourth CoC uses their own system as the coordinated assessment tool for the CoC. 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 WVOEO 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 WVOEO staff and a risk assessment is performed for each applicant. All applicants must score a minimum of 70% in each requested component to receive funding. 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, WVOEO 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.

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), the West Virginia Housing Development Fund (WVHDF) and the West Virginia Office of Economic Opportunity (WVOEO), 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 Advice. The State submitted the 2014 AI Update as an adjunct document to the Consolidated Plan submission. For the current AI, through a thorough review and analysis of actions and supporting data, the State broke down the impediments to discuss those that are recommended for removal versus those that the State will continue to report on, as well as the proposal of one (1) new impediment to address given recent information and research.