
CITY OF WHEELING, WEST VIRGINIA

*Economic & Community Development Department
1500 Chapline Street, Wheeling, WV 26003*

FY 2022 Annual Action Plan – Substantial Amendment - HOME - ARP Allocation Plan

*For Submission to HUD for the
HOME Investment Partnerships Program -
American Rescue Plan (HOME-ARP)*

*For Submission to HUD before:
March 31, 2023*

*Glenn F. Elliott, Jr.,
Honorable Mayor*



Table of Contents

Introduction	2
Consultation	5
Public Participation	28
Needs Assessment and Gaps Analysis	30
HOME-ARP Activities.....	42
Use of HOME-ARP Funding	44
HOME-ARP Production Housing Goals.....	46
Preferences	47
Referral Methods	48
Limitations in a HOME-ARP rental housing or NCS project.....	51
HOME-ARP Refinancing Guidelines	52
Appendix	53
HUD SF 424 Form	54
HUD SF 424-B Form	55
HUD SF 424-D Form.....	56
Certifications	57
Resolution.....	58
Citizen Participation Documentation	59
Agency Surveys/Consultation.....	60

Introduction

The City of Wheeling, West Virginia is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and HOME Investment Partnership Program (HOME). The City of Wheeling is the Participating Jurisdiction (PJ) for the Northern Panhandle HOME Consortium of West Virginia for the HOME Program. The Northern Panhandle HOME Consortium consists of the following local units of government: City of Wheeling, City of Weirton, Hancock County, Brooke County, Ohio County, and Marshall County.

Congress appropriated \$5 billion in funds under the American Rescue Plan (ARP) Act of 2021. These funds are to be used to assist the homeless and those persons and families who are at risk of becoming homeless. The U.S. Department of Housing and Urban Development (HUD) is administering this program and the City of Wheeling was allocated \$1,105,104 in HOME-ARP funds.

The City of Wheeling, Economic & Community Development Department is the lead entity and the administrator for the HOME-ARP funds.

The City of Wheeling prepared this HOME-ARP Allocation Plan to address its local needs and to establish priorities for the use of HOME-ARP funds. The City must submit its Allocation Plan to HUD by March 31, 2023. In order to determine the City's needs, interviews and video conferences were held with various housing providers, social service agencies, the Continuum of Care members, advocate agencies, etc. Agencies and organizations that serve all the qualifying populations were contacted and interviewed.

The City of Wheeling is a member of the Northern Panhandle CoC. Per HUD's definition:

The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The Northern Panhandle CoC covers Hancock, Brooke, Ohio, Marshall, and Tyler Counties. The region is the northernmost in the State of West Virginia, bordered by the Ohio River to the west and north and the Commonwealth of Pennsylvania to the east. Most of the five-county area is rural. The Northern Panhandle CoC cooperatively worked together with the City of Wheeling in identifying the needs and gaps in the system to end homelessness in the City of Wheeling and the CoC's regional area of operation.

HOME-ARP Eligible Projects/Activities:

The following projects/activities are eligible with the HOME-ARP funds:

- 1. Production or Preservation of Affordable Rental Housing**

- Acquisition, construction of affordable rental housing for individuals and families who are part of the Qualifying Populations.
- Can include single-family or multifamily housing, transitional or permanent housing, group homes, single room occupancy (SRO) units, and manufactured housing.

2. Tenant Based Rental Assistance

- Providing payments to a tenant to cover housing and housing-related costs, including rental assistance, security deposit assistance, utility deposits, and utility payments to households who are part of the Qualifying Populations.

3. Supportive Services

- Providing supportive services to members of the Qualifying Populations under three (3) categories:
 - McKinney-Vento Supportive Services
 - Homelessness Prevention Services
 - Housing Counseling Services

4. Purchase and Development of Non-Congregate Shelter

- Acquisition, construction, or rehabilitation of non-congregate shelter units to service individuals and families who are part of the Qualifying populations.

HOME-ARP Qualifying Populations:

The HOME-ARP Program has the following four (4) Qualifying Populations for this program:

1. Homeless

2. At Risk of Homelessness

- An individual or family who is extremely low income (<30% AMI), does not have support networks, and meets at least one of the conditions for homelessness (24 CFR 91.5)

3. Fleeing, or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

4. Other populations who do not qualify under any of the populations above but meet one of the following criteria:

- Those who are currently housed due to temporary or emergency assistance or need additional assistance or services to avoid a return to homelessness
- Populations at Greatest Risk of Housing Instability
 - Households whose income is <30% AMI and are experiencing severe cost burden
 - Households whose income is <50% AMI and meet one of the criteria for being At Risk of Homelessness

In compliance with the HUD regulations, the City of Wheeling has prepared a Substantial Amendment to its FY 2021 Annual Action Plan in order to submit the HOME-ARP Allocation Plan.

A “draft” of the FY 2021 Annual Action Plan - Substantial Amendment - HOME-ARP Allocation Plan was placed on public display at the City’s Economic and Community Development (ECD) Department, City-County Building, Room 305, 1500 Chapline Street, Wheeling, WV 26003; The Ohio County Public Library, 52 Sixteenth Street, Wheeling, WV 26003; and on the City of Wheeling’s website www.wheelingwv.gov. The display period started on Thursday, March 2, 2023 through Thursday, March 16, 2023 for a 15-day display period. A Public Hearing was held on Tuesday, March 14, 2023 to present the proposed HOME-ARP Allocation Plan and solicit resident comments. Upon completion of the 15-day comment period, the City of Wheeling submitted the FY 2021 Annual Action Plan - Substantial Amendment - HOME-ARP Allocation Plan to the U.S. Department of Housing and Urban Development Pittsburgh Field Office on or before Friday, March 31, 2023.

DRAFT

Consultation

Describe the consultation process including methods used and dates of consultation:

During the consultation process, the City of Wheeling aimed to meet with many stakeholders, agencies/organizations, and housing providers that are part of the following categories:

- The CoC serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs), and
- public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

The HOME-ARP Consultation Milestones are the following:

HOME-ARP Consultation Milestones	
Consultation	December 2022 through March 2023
Newspaper Notice	March 01, 2023
On Display	March 02, 2023
Public Hearing	March 14, 2023
Off Display	March 16, 2023
Wheeling City Council Approval	March 21, 2023

The City of Wheeling held virtual group meetings, conducted one-on-one interviews, sent out surveys, and emailed questions to agencies/organizations between December 2022 and February 28, 2023.

The City ran a newspaper notice in *The Intelligencer/News Register* on Wednesday, March 1, 2023. In the notice it states that the “Draft” HOME-ARP Allocation Plan was on public display for fifteen (15) days on the City’s website (www.wheelingwv.gov), at the City’s Economic and Community Development (ECD) Department, City-County Building, Room 305, 1500 Chapline Street, Wheeling, WV 26003, and at the Ohio County Public Library, 52 Sixteenth Street, Wheeling, WV 26003

The Public Hearing was held on Tuesday, March 14, 2023 at noon to discuss the proposed HOME-ARP Allocation Plan and solicit resident comments on the Plan.

City Council approved the HOME-ARP Allocation Plan at its City Council meeting on Tuesday, March 21, 2023.

List the organizations consulted:

The following table summarizes input gained through one-on-one interviews.

City of Wheeling – Economic & Community Development Department	
Type of Agency/Organization	Government
Method of Consultation	Virtual Meetings
Feedback	The City of Wheeling was responsible for gathering a list of contacts, was involved in all meetings, and participated in asking questions and communicating with local stakeholders.
City of Wheeling – Homeless Liaison	
Type of Agency/Organization	Government; CoC serving the jurisdiction’s geographic area
Method of Consultation	Virtual Meeting (30 JAN 2023)
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • Lack of low- or no-barrier emergency shelter • Lack of daytime homeless drop in centers • Respite housing for patients being discharged from medical care • Transitional housing with wrap-around services and intensive life skills counseling/training • Waiting list for mental health and addiction services is long • Uncoordinated duplication of services • Not enough awareness of the types and sources of services provided within the social service network • Lack of transportation to access employment, services, and healthcare • Too much of the assistance being volunteered/provided to the homeless who do not want to be housed is enabling continued homelessness

Wheeling Housing Authority	
Type of Agency/Organization	Public Housing Agencies (PHAs)
Method of Consultation	Virtual Meeting (24 JAN 2023)
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • Lack of transitional housing • Transitional housing needs to be supported with wrap-around, long-term, intensive comprehensive case management services and these services need to continue into permanent housing • Lack of a low- and/or no-barrier emergency shelter • Poor housing stock with many residential buildings condemned – lack of decent and safe housing opportunities that are truly affordable to low-income households • Assistance needed for landlords renting to low-income tenants to help fix properties to meet HQS standards • Most calls from households experiencing homeless are more often related to domestic violence or emergency situations • Lack of trained service providers across the social service network to provide intensive services and case management • The closure of the Ohio Valley Medical Center placed a significant burden on the social service network • Need more wrap-around services for the elderly and young adults aging out of foster care • Financial management and life skills counseling and education needed for low-income households and young adults aging out of foster care

Weirton Housing Authority	
Type of Agency/Organization	Public Housing Agencies (PHAs)
Method of Consultation	Virtual Meeting (26 JAN 2023)
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • Lack of emergency shelters in Hancock and Brooke Counties • Staffing issues with finding and retaining skilled social workers and case managers within the social service system • Assistance and services for mental and behavioral health that will retain people in their housing • Transitional and permanent supportive housing with wrap-around case management services • Lack of quality housing for Section 8 Housing Choice Voucher Program • Assistance needed for landlords renting to low-income tenants to help fix properties to meet HQS standards • Need for new permanent housing affordable to low-income renters • Lack of transportation for low-income to access employment, services, and healthcare • Rising fair market rate rents and the Section 8 Program’s ability to keep pace • Financial management and life skills counseling and education needed for low-income households to become more stable
Moundsville Housing Authority	
Type of Agency/Organization	Public Housing Agencies (PHAs)
Method of Consultation	Virtual Meeting (01 FEB 2023)
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • Lack of an emergency shelter in Moundsville area

	<ul style="list-style-type: none"> • Lack of services available in Moundsville for persons experiencing homelessness or at risk of becoming homeless • Lack of decent and safe housing affordable to low-income households across the board is needed, but especially for larger households (4+ bedroom units) • Emergency and transitional housing for individuals and families fleeing domestic violence • Transitional housing for households experiencing evictions • Lack of transportation to access employment, services, and healthcare
Benwood-McMechen Housing Authority	
Type of Agency/Organization	Public Housing Agencies (PHAs)
Method of Consultation	Virtual Meeting (24 JAN 2023)
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • Lack of transitional housing with intensive wrap-around case management services • Staffing shortages and turnover in the social service system • Case management and supportive services for households, particularly those with children • Need social service assessment type intervention, particularly for elderly living alone • Lack of transportation to access employment, services, and healthcare • Financial management and life skills counseling and education needed for low-income households, particularly young adults aging out of foster care
Greater Wheeling Coalition for the Homeless	
Type of Agency/Organization	Homeless service providers; Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Method of Consultation	Virtual Meeting (09 FEB 2023)
Feedback	The following needs were identified:

	<ul style="list-style-type: none"> • Transitional housing, particularly for households with children • Underutilization of the existing emergency shelters • Drug tests, background tests, etc. in some of the emergency shelters dissuades persons experiencing homelessness from seeking services • Regulatory restrictions on case manager funding results in very high caseloads • Need more services for first-time homeless – large proportion of people experiencing homelessness during the pandemic were homeless for the first time • Homeless prevention services that meet higher demand • “Couch surfers” are a population where the current demand is hidden • More diverse array of treatment and services for mental health and substance abuse • The lack of housing planning for individuals discharged from hospitals or incarceration is a significant contributing factor to the unhoused population • At-risk of homelessness should be the highest priority for aid and assistance
--	---

The following table summarizes input gained through group virtual meetings.

Virtual Group Meeting No. 1 – 25 JAN 2023			
Participant	Ohio County Health Department – Project Hope	Type of Agency/Organization	Government; Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Ohio County Family Resource Network	Type of Agency/Organization	Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities

Participant	Brooke-Hancock Family Resource Network	Type of Agency/Organization	Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • There is a lack of transitional housing throughout the Northern Panhandle • Transitional housing needs to be supported with intensive case management and wrap-around services to include counseling, education, and training in the areas of financial planning and management, life skills, household planning and management, health care planning and management, and employment • Lack of respite housing for those in need of acute and post-acute medical care who are experiencing homelessness, unstably housed, or too ill or frail to live in a shelter or their own homes but are not sick enough to be in a hospital • Local hospitals and corrections facilities are discharging or releasing without a housing plan in place, which is contributing to the size and extent of the homeless population • Low- to no-barrier emergency shelter • Lack of safe and decent housing affordable to low- and extremely low-income populations • Lack of sufficient emergency and transitional housing available to those fleeing domestic violence, sexual assault, and human trafficking, particularly outside of Wheeling and Ohio County (Hancock, Brooke, and Marshall Counties) • Housing affordable to low- and extremely low-income populations that are served by public transit / transportation to access employment, services, and healthcare • Housing, assistance, and intensive case management services for those with mental and behavioral health disabilities • Housing, assistance, and intensive case management services for young adults aging out of foster care • Additional workforce training • More public housing or subsidized housing for households with children, particularly larger families • More emergency shelter space for families with children • More case management that is not centered in Family Resource Networks that are overloaded and unaware of services available to individuals without children experiencing homelessness or are at risk of becoming homeless 		

- Lack of public and private transportation for low- and extremely low-income populations to access employment, services, and healthcare
- Lack of coordination of information concerning what services are available and what agencies are delivering different services for those experiencing homelessness, those at risk of homelessness, and those fleeing domestic violence, sexual assault, and human trafficking.
- Lack of affordable childcare

Virtual Group Meeting No. 2 – 26 JAN 2023

Participant	YWCA	Type of Agency/Organization	Domestic violence service provider; Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Helping Heroes	Type of Agency/Organization	Veterans’ group; homeless service provider; Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	WVDHHR – Bureau for Family Assistance	Type of Agency/Organization	Government; Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Ohio County Family Support Center	Type of Agency/Organization	Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	ReEntry Alliance	Type of Agency/Organization	Public agency that addresses the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Brooke-Hancock Family Resource Network	Type of Agency/Organization	Public agency that addresses the needs of the qualifying populations, and public or private organizations that

			address fair housing, civil rights, and the needs of persons with disabilities
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> • There are no shelters in Hancock and Brooke County and there are no transportation options to access shelters in Steubenville, OH and Wheeling, WV • There is a lack of supervised housing mental and/or behavior disability populations • Re-entry and transitional housing are needed for those discharged from medical care and released from incarceration – local hospitals and corrections facilities are discharging/releasing without housing plans in place • Lack of low- and no-barrier shelter space • Lack of transitional housing for households with children • Lack of housing units for larger families (4+ children) • There is no 24-hour shelter or drop-in centers for homeless populations • There is a lack of shelter space for homeless with healthcare needs • There is a lack of shelter for elderly populations • Lack of ADA accessible housing that is affordable to low- and extremely low-income populations • Extremely difficult to place registered sex offenders • There is a lack of quality housing that passes HUD’s Housing Quality Standards (HQS) and is affordable to low- and extremely low-income populations • There is an insufficient number of landlords willing to accept Section 8 Housing Choice Vouchers • Obtaining identification (IDs) is difficult – the nearest DMV to Wheeling is in Moundsville • Getting IDs reinstated is a challenge due to past fines • Lack of funding for getting children IDs. • Severe lack of mental health and addiction services – circular issue – don’t have the resources and services available to keep people healthy 		

	<ul style="list-style-type: none"> • Lack of cooperation between agencies • Bias is a problem – lack of education across all sectors (providers, law enforcement, emergency responders, etc.) • The 2019 closure of the Ohio Valley Medical Center (OVMC) was a huge loss for acute health services • Drug overdoses rose 40% during COVID in the Wheeling area • Lack of access to and management assistance of prescriptions • Lack of transportation to access employment, services, and healthcare 		
Virtual Group Meeting No. 3 – 27 JAN 2023			
Participant	United Way of the Upper Ohio Valley – 2-1-2	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Jobs and Hope WV (Hancock, Brooke, and Ohio Counties)	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	CHANGE, Inc.	Type of Agency/Organization	Domestic violence service provider; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Housing of the Carpenter	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Catholic Charities West Virginia	Type of Agency/Organization	Homeless service providers; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities

Feedback

The following needs were identified:

- Lack of shelters north of Wheeling and lack of transportation to access shelters in Steubenville, OH and Wheeling, WV
- Lack of shelter space for families
- Lack of safe and decent housing affordable to low- and extremely low-income populations
- Lack of landlords willing to participate in the Section 8 Housing Choice Voucher Program
- Lack of transitional housing opportunities to serve after shelter stays and before permanent housing is obtained
- Lack of housing opportunities for and landlords willing to work with people with criminal backgrounds
- Veterans are choosing to stay homeless because they do not want to go to Wheeling, WV or Steubenville, OH for shelter space
- Lack of resources available to fund housing rehabilitation
- Lack of landlords willing to fix their dwelling units resulting in poor quality housing and higher utility bills
- New constructed “affordable” housing is not affordable to lowest income households
- Households are trapped in substandard housing because they cannot afford anything else
- Lack of transitional housing for incarceration re-entry and for victims of domestic violence
- Lack of wrap-around case management to support transition between shelter and permanent housing
- No enough resources for services needed by mental illness populations to stabilize their lives
- Lack of life skills education
- Not enough targeted populations are willing to participate in life skills education...generational perspective...this is how I was raised and my parents made it work
- Caseload for case management is too high...need more social workers...very hard to find qualified and more experienced social workers...everyone is short-staffed...grant funding is limited to hire additional social worker and case management staff
- A lot of Seniors calling for assistance but want to stay in their own homes
- Need less band-aid assistance and more comprehensive, long-term, wrap-around services

	<ul style="list-style-type: none"> Lack of affordable childcare...long waiting lists 		
Virtual Group Meeting No. 4 – 28 JAN 2023			
Participant	Wheeling Health Right	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Participant	Soup Kitchen of Greater Wheeling	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
Feedback	<p>The following needs were identified:</p> <ul style="list-style-type: none"> Lack of decent housing affordable to low- and extremely low-income populations Households are being displaced by out-of-state natural resource extraction workers Landlords are unwilling to maintain dwelling units and are raising rents More mental health and drug abuse services are needed Lack of communication and collaboration among the social services providers Lack of transportation to access employment, services, and healthcare Lack of sufficient re-entry housing and services Lack of hospice services 		

The following table summarizes input gained through agency survey responses.

Agency Survey Responses Summary			
Respondent	Catholic Charities of West Virginia	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities; homeless service providers.
Respondent	CHANGE, Inc.	Type of Agency/Organization	Domestic violence service providers; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	Helping Heroes	Type of Agency/Organization	Veterans’ groups; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	Northern Panhandle Parents as Teachers	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	Ohio County Family Resource Network	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	Ohio County Family Support Center	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	WV 211 United Way of the Upper Ohio Valley	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that

			address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	The Soup Kitchen of Greater Wheeling	Type of Agency/Organization	Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	West Virginia Department of Health and Human Resources Bureau for Family Assistance	Type of Agency/Organization	Government; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	YWCA Wheeling – Domestic Violence, Recovery, Human Trafficking and Homeless	Type of Agency/Organization	Domestic violence service providers; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Respondent	YWCA Wheeling	Type of Agency/Organization	Domestic violence service providers; Public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
Unmet Housing and Service Needs:			
Sheltered and Unsheltered Homeless Persons:		<ul style="list-style-type: none"> • Funding for deposits and first month’s rent • Low-barrier shelter and housing options • Finding stable and affordable housing • No homeless shelter in Hancock and Brooke Counties...must travel to Wheeling or out of state • All shelters in Wheeling are overnight only • Larger apartments for women with three or more children • Not enough beds in Wheeling that are easily accessible for shelter • Helping Heroes is working to provide 27/7 emergency shelter for veterans at new location currently under renovation 	

	<ul style="list-style-type: none"> • Limited time frame for assistance...most shelters offer a 30-day stay...Public Housing and Section 8 Voucher waitlists are much longer than 30 days • Women and children are at the highest risk of not being able to obtain shelter year round • Coordinated case management and community-wide approach to solving cases on an individual basis • We have plenty of band-aid solutions but active participation of providers across the spectrum of services to use coordinated entry (HMIS) and case management with open communication is sub-par • Inadequate mental health and substance use disorder (SUD) services • Lack of public transit and transportation • Affordable rents to get established in housing • Livable wage • Severe mental health assistance for adults and children • Getting released from an institution without medication • Respite care • Childcare (high cost, not enough availability, non-traditional hours) • Assistance with basic household needs when housing is obtained
<p>Households who are At Risk of Homelessness:</p>	<ul style="list-style-type: none"> • Increasing housing costs in both rental and owner markets • Low-income families • Finding stable and affordable housing • Assistance is unavailable for Veterans who own their home, but are at risk of foreclosure...prevention funds are only available to Veterans renting • Lack of resources to teach financial literacy for long-term success in and outside of shelters • Feelings of hopelessness leading to lack of motivation • Lack of knowledge of tenants' rights and dealing with "slumlords" • Lack of transportation to get to employment/childcare to maintain housing

	<ul style="list-style-type: none"> • Loss of car/transportation Childcare • Mental health and addiction services • Rental and utility assistance without barriers such as proof of eviction or shut-off notice (this would help prevent them from getting buried under back rent and giant utility bills) • Assistance with applying for Section 8 Housing Voucher and placed in income-based housing • Connection to legal counsel on tenant rights • Seniors • Those with pets • Assistance with basic household needs when housing is obtained
<p>Other persons requiring services or housing assistance to Prevent Homelessness:</p>	<ul style="list-style-type: none"> • People released from incarceration • Families evicted for one reason or another • People struggling with addiction and mental health...duel addiction counseling or assistance...rehabilitation options • Family members/caregivers of Veterans • Elderly • Lack of available high-rise age-restricted housing in Wheeling • Those experiencing unexpected health issues • Those in between jobs • Those awaiting disability • Fear of retaliation and lack of legal support when pursuing housing issue solutions • Rental and utility assistance, back rent assistance, deposit assistance, and related assistance without barriers such as proof of eviction or shut-off notice (this would help prevent them from getting buried under back rent and giant utility bills) • Assistance with applying for Section 8 Housing Voucher and placed in income-based housing • Connection to legal counsel on tenant rights

	<ul style="list-style-type: none"> • Vermon and bug infestations
<p>Persons who are at greatest risk of Housing Instability:</p>	<ul style="list-style-type: none"> • Mental health support • Families with children • Seniors/Elderly • Women • Persons experiencing intimate partner violence (IPV), domestic violence victims, human trafficking victims • Runaway homeless youth • Members of the LGBTQ community • Single parents • People suffering with mental illness and severe mental illness • Chronic homeless • Uneducated or undereducated • Finding permanent and stable employment • Finding stable and affordable housing • There is a lack of housing for Veterans whose physical or mental health makes employment and independent living difficult or impossible • Persons experiencing substance use disorder (SUD) • Rental and utility assistance without barriers such as proof of eviction or shut-off notice (this would help prevent them from getting buried under back rent and giant utility bills) • Assistance with applying for Section 8 Housing Voucher and placed in income-based housing • Connection to legal counsel on tenant rights • Single individuals on disability • People living in substandard housing that landlords are not maintaining, charging high security deposits and not returning, and charging high rents

<p>Persons living in Unsuitable Housing Situations:</p>	<ul style="list-style-type: none"> • Low-income population • Families • Elderly • Finding stable and affordable housing • Assistance is unavailable for Veterans who own their home, but are at risk of foreclosure • Section 8 Housing Choice Voucher Program participants • Persons with learning disabilities, physical disabilities, and mental disorders • Assistance with applying for Section 8 Housing Voucher and placed in income-based housing • Connection to legal counsel on tenant rights • Seniors who are unable to repair homes • Lack of enforcement of minimum property maintenance standards that allows landlords to rent substandard housing
<p>Any other Populations:</p>	<ul style="list-style-type: none"> • People suffering with undiagnosed mental health issues and low/no education • People with substance abuse disorder • Families with only one income • Unexpected major lifestyle changes
<p>Do you know of any gaps in the current shelter system?</p>	
<ul style="list-style-type: none"> • Low-barrier shelter • Re-entry • Lack of wrap-around services • Severely mental ill • Women and children have no shelter options in Wheeling unless fleeing a domestic violence situation • No shelter in Hancock or Brooke Counties 	<ul style="list-style-type: none"> • Shelter for families • Persons with HIV • Space for unsheltered individuals who have mental health conditions that are not severe enough to warrant a mental hygiene hold or involuntary commitment • Space for non-Veteran families to be placed together • More space for women

<ul style="list-style-type: none"> • Current shelters are difficult to access...individuals are required to pass drug tests, have photo IDs, etc. • The hours of current shelters leave gaps in coverage, especially important in cold winter months or during the heat of summer, and no place to be during the day...lack of 24-hour shelters • Shelter employees with a lack of trauma informed care 	<ul style="list-style-type: none"> • Lack of placement for those with a pet • Addict to or using alcohol and/or drugs • Pedophiles
<p>Are there gaps in current housing inventory?</p>	
<ul style="list-style-type: none"> • Waitlists are long and background checks coupled with the inability to produce first month's rent and deposit • Re-entry housing • Shortage of available units that are affordable to low and extremely low-income populations • Nonexistent shelters and transitional housing in Hancock and Brooke Counties • It is difficult to locate housing for Veterans with disabilities or criminal histories such as sex offenders • Housing for those addicted to drugs • Housing for those with severe mental illness 	<ul style="list-style-type: none"> • Larger apartments for women with three or more children • Lack of landlords willing to participate in the Section 8 Housing Choice Voucher Program • Lack of housing that meets HUD's Housing Quality Standards (HQS) • Affordable housing along public transit routes • Placement for women not in a domestic violence situation • Local housing market does not appear to have recovered from inflated rents resulting from out-of-state extractive industry workers
<p>Are there gaps in current service delivery system?</p>	
<ul style="list-style-type: none"> • Helping clients find housing that meets HUD's Housing Quality Standards (HQS) • The CoC's traditionally excessively strict interpretation of what it means to be homeless and extremely narrow hours for coordinated entry as well as an overly cumbersome coordinated entry process are barriers which cause many seeking assistance 	<ul style="list-style-type: none"> • Dedicated services and case management for unsheltered individuals who have mental health conditions that are not severe enough to warrant a mental hygiene hold or involuntary commitment • Lack of transportation to shelters and services • Childcare

<p>to fall through the cracks and fail to receive services and assistance</p> <ul style="list-style-type: none"> • Need for more financial literacy for persons prone to homelessness • Need more referrals to and more mental health services for both adults and children • Need more referrals to primary care physicians • Need for more meaningful collaboration and communication across the social service sector, which is hindered by high caseloads, some providers only working with certain providers and not on a broader range of agencies, and the disconnect between providers who want to end homelessness and those who do not have that as a top priority 	<ul style="list-style-type: none"> • Times when assistance for housing and transportation is available • Homeless persons who did not originate in the Northern Panhandle • Kindness
<p>What factors would contribute to households becoming homeless?</p>	
<ul style="list-style-type: none"> • Lack of affordable housing • Inability to pay rent in a timely manner, rent has significantly increased over the years • Loss of employment or benefits • Illness • Poor money management and lack of life skills • Unsafe living conditions • Substance use and abuse • Spouse dying • Increased costs of food, rent, healthcare, etc. • Criminal history • Mental illness 	<ul style="list-style-type: none"> • Single parenthood • Having a child or children with special healthcare needs • Intimate partner violence (IPV) • Low educational attainment • Lack of childcare • Lack of transportation • Lack of access to mental health and addiction services • Eviction • Lack of job stability • No funds to repair home • Unexpected expenses for those living paycheck-to-paycheck

Identify the characteristics of housing associated with instability and any which may contribute to the risk of homelessness?	
<ul style="list-style-type: none"> • Older homes that contribute to health issues • Unsafe or unlivable conditions • Housing without proper isolation from the elements (outdoor weather) or lacking utilities, heating, etc. • Limited funding for back rents • High fair market housing rates • Overcrowded housing • HUD’s Housing Quality Standards (HQS) 	<ul style="list-style-type: none"> • Transportation to and from work • Limited jobs in the downtown (Wheeling) area where most high rises are located • Rising late fee costs from landlords • Couch surfing • Engaging/interacting with multiple partners • Grooming for and human trafficking
Identify priority needs for Qualifying Populations.	
<ul style="list-style-type: none"> • Housing • Rental assistance • Enforcement of minimum property maintenance standards • Identification for people (birth certificate, photo identification, Social Security Card, etc.) • Need more resources to assist and serve homeless population in Hancock and Brooke County • Veterans who served our country should always be prioritized 	<ul style="list-style-type: none"> • Childcare • Transportation • Medical care • Home repairs • Access to housing assistance for those temporarily staying with a friend

What is the level of priority for each of the Qualifying Populations?				
	High	Medium	Low	Any specific sub-population that needs more assistance?
Homeless				Mental health
At Risk of Homelessness				Employability
Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking				
Other populations who do not qualify under any of the populations above, but meet one of the following criteria: A. Other families requiring services or housing assistance to prevent homelessness B. Those at risk of greatest risk of housing instability				Recovery, re-entry
Other Comments/Suggestions:				
<ul style="list-style-type: none"> Any initiative that will likely increase the amount of homeless in Wheeling by drawing in unsheltered people from other areas, should consider that all programs providing assistance will also be impacted and financial support should be provided. Further, any programs that are to be funded should not be a duplication of existing services. If expansion of existing services is needed, funding should be directed to those programs so that they may expand. 				

Summarize feedback received and results of upfront consultation with these entities:

There were many different reoccurring needs mentioned by stakeholder agencies during the consultation process, including:

- The lack decent and safe housing affordable to low- and extremely low-income populations - low quality housing stock.
- The lack of comprehensive, coordinated, wrap-around supportive services from the emergency shelter space through and including the permanent supportive housing space.
- Lack of transitional housing.
- Lack of re-entry housing and related services.
- Lack of housing for those with mental and severe mental disabilities and housing for those with substance use disorder (SUD)
- Lack of housing for the elderly, for the disabled, and for households with three (3) or more children.
- Lack of respite housing and related services.
- Lack of shelters in Hancock, Brooke, and Marshall Counties.
- Lack of 24-hour shelters and/or drop-in or day centers.
- Lack of affordable housing near public transportation.
- Lack of life and personal financial management skills, no or low education attainment.
- Lack of transportation.

The City of Wheeling attempted on several occasions to engage the following agencies that did not respond: Faith in Action Wheeling, Family Services of Upper Ohio Valley, Helinski Shelter, House of Hagar, Information Helpline, Legal Aid of West Virginia, Marshall County Family Resource Network, Marshall County Schools, Mother Jones Center for Resilient Community, Northern Regional Jail, Northwood Homeless Shelter, Ohio County Health Department, Ohio County Schools, Ohio Valley Pride, Public Defender's Office – Peer Recovery, Salvation Army Weirton, Salvation Army Wheeling, Samaritan House, Seeing Hands Association, Street Moms, Tuel Center and Transitional Living Services, Unity Center, Wheeling Habitat for Humanity, Wheeling Hospital, Wheeling Veterans Center, Youth Services System, and Wheeling NAACP.

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice:*** March 1, 2023
- ***Public comment period:*** start date - March 2, 2023 – end date - March 16, 2023
- ***Date(s) of public hearing:*** March 14, 2023 at noon

Describe the public participation process:

The City of Wheeling held one (1) public hearing for consultation with City residents, non-profit agencies and/or organizations, public housing authority, housing providers, Continuum of Care members, etc. on the “Draft” HOME-ARP Allocation Plan. During the public hearing, the City staff and the City consultants discussed the process followed in the development of the HOME-ARP Allocation Plan. This included the interviews and virtual meetings, and remarks made.

The public hearing notice for the City of Wheeling HOME-ARP Allocation Plan was published in the *Intelligencer/Wheeling News-Register* on Wednesday, March 1, 2023.

The fifteen (15) day public comment period on the “Draft” HOME-ARP Allocation Plan was from Thursday, March 2, 2023 through Thursday, March 16, 2023. The City of Wheeling placed the “Draft HOME-ARP Allocation Plan on the City’s website (www.wheelingwv.gov), at the City’s Economic and Community Development (ECD) Department, City-County Building, Room 305, 1500 Chapline Street, Wheeling, WV 26003, and at the Ohio County Public Library, 52 Sixteenth Street, Wheeling, WV 26003.

The public was able to provide additional comments, via email to mthompson@wheelingwv.gov or via phone at (304) 234-3698. Written comments were addressed to the City of Wheeling’s Office of Economic & Community Development, attention Ms. Melissa Thompson, Community Development Specialist, 1500 Chapline Street, Room 305, Wheeling, WV 26003.

Describe efforts to broaden public participation:

To broaden public participation, the City of Wheeling sent out email blasts to all agencies, organizations, and individuals on its list of non-profit agencies, housing providers, advocates, and interested parties, that the “Draft” HOME-ARP Allocation Plan was on public display and date, time, and place of the public hearing. This list consists of over 100 email addresses of names and organizations that have previously submitted funding requests or requested to be added to this

list so they can be notified of future emails on funding options, proposed plans, and public hearings.

In addition, the City posted the Public Hearing Notice on the City's website.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

A summary of comments and recommendations will be included after they are received.

Summarize any comments or recommendations not accepted and state the reasons why:

A summary of any comments or recommendations that were not accepted will be included after the comment period is concluded.

DRAFT

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	29	9	38	38	6								
Transitional Housing	9	3	22	22	5								
Permanent Supportive Housing	0	0	18	18	0								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						2	101	7	14				
Unsheltered Homeless						0	9	0	3				
Current Gap										0	0	72	72

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

	Non-Homeless		
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	13,435		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,085		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,595		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,545	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,850	
Current Gaps			7,395

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

Based on the 2022 Point-In-Time Count, there were 122 homeless individuals identified in the Northern Panhandle CoC. Of those people experiencing homelessness, 110 (90.2%) were white, 8 (6.6%) were Black or African American, and the remaining 3.3% identified as having multiple races. Additionally, 69 (56.6%) were male, 50 (41.0%) were female, and 3 (2.5%) identified as transgender or gender non-conforming.

Among the population of those experiencing homelessness, 28 individuals (23.0%) were identified as severely mentally illness and 24 individuals (19.7%) were identified as having chronic substance abuse issues.

At Risk of Homelessness as defined in 24 CFR 91.5

24 CFR 91.5 defines At Risk of Homelessness as an individual or family that has an annual income below 30% of the HUD area median family income, does not have sufficient resources or support networks and meets one of several other conditions. According to the most recently available CHAS data, 7,195 households (or 13.8% of the total population) live at 30% or below the HUD Area Median Income and of those 7,195 households, 4,625 have one or

more housing problems, which includes either incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, or have a cost burden greater than 30%.

There is a total of 739 households currently on the public housing waiting lists across the four (4) housing authorities operating in the Northern Panhandle (Wheeling HA - 475, Weirton HA - 15, Moundsville HA - 51, and Benwood-McMechen HA 198). All four (4) Authorities' public housing waiting lists are open.

The Section 8 Housing Choice Vouchers offered through the Wheeling Housing Authority and the Weirton Housing Authority currently have waiting lists of 445 and 30 respectively. Both waiting lists are open.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

During the 2022 Point-In-Time Count, there were 17 homeless individuals who were identified as victims of domestic violence in the Northern Panhandle CoC. Additionally, according to 2022 data from the Homeless Management Information System (HMIS), 26 people of the 104 assisted in rapid-rehousing reported domestic violence at entry and one (1) person reporting as fleeing.

YWCA (Wheeling) serves women and children primarily, but also men, who have been victimized in domestic violence or human trafficking in Ohio, Marshall, Wetzel, and Brooke Counties, but also the State of West Virginia for human trafficking. Among several of its programs, the YWCA (Wheeling) administers a Family Violence Prevention Program (FVPP) and a Survivors of Trafficking Empowerment Program (STEP). According to an interview with YWCA (Wheeling) staff, the following data represents the period of January 1, 2022 through December 31, 2022:

- 1,107 individuals were served
 - 4,950 shelter nights
 - 4,994 transitional nights
 - 5 families were housed in hotels, more than ever in the past because the shelter was full at times and women were sleeping on couches
- There were 39 victims of human trafficking served for 2,388 nights
- 970 individuals received non-residential services
- 135 crisis/hotline calls were received

According to an interview with CHANGE, Inc. staff, which operates the Lighthouse (Weirton), the following data represents the period of January 1, 2022 through December 31, 2022:

- 43 individuals were served for 1,434 nights and zero (0) unmet requests for shelter
- 195 individuals received non-residential services
- 406 crisis/hotline calls were received

According to the Wheeling Police Department's Domestic Violence analysis from 01 OCT 2021 to 03 OCT 2022:

- There were 615 total Domestic Violence calls for service
- 181 (29%) of those calls for service rose to the level of a criminal case
- 103 (57%) of those criminal cases resulted in arrests
- The busiest day of the week for Domestic Violence calls for services were Fridays, and the busiest peak times of day for calls were between 8 p.m. to 2 a.m. and between 10 a.m. and 12 p.m.

The 2021 Federal Human Trafficking Report for the State of West Virginia identified seven (7) sex trafficking cases and zero (0) forced labor cases within the Mountain State, three (3) of which were in the northern portion of the state that includes the Northern Panhandle. All victims were female and a 100% conviction rate was achieved.

Supportive housing and service needs for this population include 24-hour crisis/hotline, emergency shelter, transitional housing, case management, trauma recovery counseling, legal and employment advocacy, support and therapeutic groups, addiction services for co-occurring addiction, identification assistance, life skills training (financial management, parenting, cooking, employment, etc.) supervised visitation and exchange, batter's intervention, and teen dating violence advocacy.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Those with disabilities are at greatest risk of housing instability. According to the most recent American Community Survey (ACS) data from 2021, there were 21,100 residents (17.0% of the total civilian non-institutionalized population) of the Northern Panhandle counties of Hancock, Brooke, Ohio, and Marshall. This shows that a significant portion of the Northern Panhandle's population is at a high risk of housing instability.

Among others that are at greatest risk of housing instability, those who are at or below 30% of the HUD Area Median Income who are burdened by their monthly housing costs are at a higher risk of becoming homeless. According to the most recent CHAS data, 7,195 (13.8%) households in the City have incomes at or below 30% of the HUD AMI. 9,279 (17.8%) households in the City have a housing cost burden of greater than 30% of their income.

For persons and households requiring services or housing assistance to prevent homelessness, there were 104 assisted households in rapid re-housing, and 68 households in homeless prevention services according to the Housing Management Inventory System (HMIS).

The Northern Panhandle HOME Consortium also has a significant population of ALICE families. ALICE is an acronym for Asset Limited, Income Constrained, and Employed. This represents families who are employed and earn more than the Federal Poverty Level but cannot otherwise keep up with the basic costs of living. According to the most recent ALICE Report data from 2019, between 26% and 29% of households in the counties that make up the Northern Panhandle HOME Consortium have incomes that fall below the ALICE threshold of not being able to afford basic housing necessities but are above the Federal Poverty Level.

A large number of households in the region have also received payments for rental assistance. According to an interview with YWCA staff, 130 households received rent assistance through the YWCA out of the 358 households who contacted the YWCA requesting assistance.

In the most recent data available for 2022, there were 739 households on the public housing waiting lists and 475 households on the Section 8 Housing Choice Vouchers waiting lists for the four (4) public housing authorities operating within the Northern Panhandle.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

The City of Wheeling and the Northern Panhandle have a variety of resources to assist households experiencing homelessness and at-risk of becoming homeless through Federal, State, and local programs. These programs range from emergency shelters for households experiencing homelessness, through the development of affordable rental housing for extremely low-income and low-income households. Below is a summary of the resources available through the Cities of Wheeling and Weirton:

- **Community Development Block Grant (CDBG) Program:**

The cities of Wheeling and Weirton are a federal entitlement grantee. In FY 2022 the City of Wheeling received \$1,153,109 and the City of Weirton received \$405,433 in Community Development Block Grant (CDBG) funds. These funds are used for public service activities, housing activities, public facility and infrastructure improvements, and economic development activities. Funding is provided to agencies for services to the homeless and those who are at-risk of becoming homeless.

- **HOME Investment Partnership (HOME) Program:**

The City of Wheeling is the Participating Jurisdiction (PJ) for the Northern Panhandle HOME Consortium of West Virginia under the HOME Investment Partnership (HOME) Program and received \$346,427 in FY 2022 HOME funds. Non-CHDO set aside funds are used to provide downpayment and closing cost assistance for income eligible households in purchasing their homes. CHDO set aside funds are used for the acquisition and rehabilitation or new construction of rental housing for income eligible households. These funds support the preservation and development of affordable housing to the very low-income to combat those households who are at risk of becoming homeless.

- **Housing Inventory Count (HIC):**

The chart below is the Continuum of Care Housing Inventory Count (HIC) for 2022.

	Family Units	Family Beds	Adult Only Beds	Child Only Beds	Total Year Round Beds	Seasonal	Overflow/ Vouchers	Subset of Total Bed Inventory		
								Chronic Beds	Veteran Beds	Youth Beds
Emergency, Safe Haven and Transitional Housing:	12	38	60	5	103	40	14	N/A	11	19
Emergency Shelter	9	29	38	5	72	40	14	N/A	6	5
Transitional Housing	3	9	22	0	31	N/A	N/A	N/A	5	14
Permanent Housing:	3	6	36	0	42	N/A	N/A	16	5	0
Permanent Supportive Housing	0	0	18	0	18	N/A	N/A	16	0	0
Rapid Re-Housing	3	6	18	0	24	N/A	N/A	N/A	5	0
Grand Total:	15	44	96	5	145	40	14	16	16	19

The Northern Panhandle CoC has a total 103 emergency, safe haven, and transitional housing beds and 42 permanent housing beds. Of those number of units, the CoC has 11 beds for veterans and 19 beds for youth under emergency, safe haven, and transitional housing. The CoC has 5 permanent housing beds for veterans, 16 beds for chronic homeless, and zero (0) beds for youth.

Based off the 2022 Continuum of Care Housing Inventory Count (HIC), there are 72 year-round emergency shelter beds; 231 year-round transitional housing beds; 18 year-round permanent housing beds; and, 24 year-round rapid re-housing beds. These resources and supportive services are as follows:

- **Emergency Shelter:**
 - **CHANGE, Inc.** – Lighthouse Domestic Violence9 beds
 - **Greater Wheeling Coalition for the Homeless** – NPC/ESG/Transitional..... 13 beds
 - **Helping Heroes of Moundsville** – NPC/ESG.....6 beds
 - **Northwood Health Systems** – 16th Street Facility 11 beds
 - **Wheeling Salvation Army** 12 beds
 - **Youth Services System, Inc.** – Winter Freeze Shelter 50 beds
 - **Youth Services System, Inc.** – NPC/BCP Emergency Shelter5 beds
 - **YWCA** – Homeless Program3 beds
 - **YWCA FVPP** – Madden House 17 beds
- **Transitional Housing:**
 - **Helping Heroes of Moundsville** – Transitional Housing5 beds
 - **Youth Services System, Inc.** – NPC/RHY/Transitional Housing..... 14 beds
 - **YWCA** – FVPP Transitional Housing 12 beds
- **Permanent Supportive Housing:**
 - **Greater Wheeling Coalition for the Homeless** – Residential Housing 18 beds
- **Rapid Re-Housing:**
 - **Greater Wheeling Coalition for the Homeless** – ESG/RRH/CV 19 beds
 - **Greater Wheeling Coalition for the Homeless** – SSVF/RRH.....2 beds
 - **Helping Heroes of Moundsville** – HH/SSVF/RRH.....3 beds

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

According to the 2022 Point-In-Time Count, there was 112 households experiencing homelessness, 103 households were sheltered, and 9 households were unsheltered. The unmet housing need for this qualified population is to increase the number of shelter beds and permanent supportive housing units. Based on consultations with homeless providers, the greatest need is a place for persons who are staying in shelters to move on to permanent housing, thereby moving to overcome the “bottleneck” in the shelter to permanent housing order. Therefore, agencies have identified the need for the development of more permanent supportive housing units.

The supportive services that are needed include the following: case management, transportation, counseling services, credit repair, life skills and personal financial management training, educational services, childcare, employment assistance and job training, food, housing searches, legal services, mental health services, outpatient health services, outreach services, substance abuse treatment services, mediation, landlord/tenant liaison, services for special populations, and financial assistance costs.

At Risk of Homelessness as defined in 24 CFR 91.5

The primary unmet housing needs of those at risk of becoming homeless is the lack of affordable housing units across the Northern Panhandle, particularly in the urban centers of Wheeling and Weirton. At risk of homelessness refers to that qualifying population who live at 30% or below the HUD Area Median Income and have one or more housing problems. This qualifying population needs short- and long-term rental and utility assistance, along with affordable permanent housing options. Developing affordable permanent supportive housing units will advance housing stability by keeping households that are cost burdened from becoming homeless.

The supportive services that are needed include the following: case management, transportation, counseling services, credit repair, life skills and personal financial management training, educational services, childcare, employment assistance and job training, food, housing searches, legal services, mental health services, outpatient health services, outreach services, substance abuse treatment services, mediation, landlord/tenant liaison, services for special populations, and financial assistance costs.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to the 2022 Point in Time Count, there were 17 homeless individuals who were identified as victims of domestic violence. Additionally, according to 2022 data from the HMIS, there were 104 households assisted in rapid-rehousing, of which 26 reported domestic violence at entry and one (1) reporting fleeing. Of the 68 households served in homeless prevention services, 13 reported domestic violence at entry and 3 reported fleeing.

According to an interview with the YWCA (Wheeling) staff, five (5) families were housed in hotels in 2022, which is more than ever in the past because their shelter was full, and women were sleeping on couches within the facility. Shelter space is limited at times and there are limited safe and affordable housing options to assist moving toward self-sufficiency. The unmet housing need for this qualified population is to increase the number of domestic violence shelter beds and of permanent supportive housing units.

There is also a need for more case management and support services to assist in overcoming barriers to securing and/or maintaining employment; high food costs; access to transportation and/or childcare to maintain employment; and readily available services to address mental health issues.

There is also a need for more case management, access to transportation, counseling services, credit repair, life skills and personal financial management training, educational services, childcare, employment assistance and job training, food, housing searches, legal services, mental health services, outpatient health services, outreach services, substance abuse treatment services, mediation, landlord/tenant liaison, services for special populations, and financial assistance costs. Supportive services are crucial to ensuring housing stability within this qualifying population.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

The unmet housing and service needs for other populations at greatest risk of housing instability is the delivery of accessible and comprehensive wrap-around supportive services. These individuals may have a substance abuse, mental health issues, and/or physical disabilities. To prevent housing instability within this population, long-term permanent housing assistance with case management and wrap-around support services are critical. Populations within this qualifying category identified during the consultation process as having unmet housing and service needs include physically disabled, developmentally challenged, and young adults aging out of foster care. Long-term permanent housing and accessible dwelling units were identify as the unmet housing need.

The supportive services that are needed for this qualifying population include the following: case management, transportation, counseling services, credit repair, life skills and personal financial management training, educational services, childcare, employment assistance and job training, food, housing searches, legal services, mental health services, outpatient health services, outreach services, substance abuse treatment services, mediation, landlord/tenant liaison, services for special need populations, and financial assistance costs.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The City of Wheeling's limited supply of decent and safe housing affordable to low- and extremely low-income households is the largest gap in the system. This gap is much larger than the available resources that the City has, but the City will used the HOME-ARP funds to leverage additional funds for developing as many affordable housing options as possible.

According to the 2022 Point In Time Count (PIT), the CoC has 11 unsheltered homeless persons and 111 sheltered homeless. With the emergency shelter beds near capacity, this leaves 11 homeless persons living on the streets and waiting to access shelter beds.

To assist in meeting the need to provide permanent housing, CoC member agencies work with the four (4) Public Housing Authorities operating in the Northern Panhandle for housing assistance through either public housing units or through the Section 8 Housing Choice Voucher Program. There was a total of 1,078 public housing units and a waiting list of 739 persons in 2022 within the Northern Panhandle. Two (2) of these four (4) Public Housing Authorities administer a total of 873 Vouchers in 2022, with a total waiting list of 475 persons. Both waiting lists are open.

The Wheeling Housing Authority will consider project-based voucher proposals to help build the supply of more affordable units in the City.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

The City of Wheeling is not providing additional characteristics associated with instability and increase risk of homelessness in the City’s HOME-ARP Allocation Plan.

Identify priority needs for qualifying populations:

During the HOME-ARP consultation, the following top priority needs for the qualifying populations were mentioned:

- Need for more decent and safe housing options that are affordable to low- and extremely low-income households.
- Need for permanent supportive housing.
- Need for comprehensive, coordinated, wrap-around supportive services such as case management, counseling, life skills, childcare, transportation, legal services, and job training.
- Need for re-entry and transitional housing as a relief to the shelters.
- Need for housing for those with mental and severe mental disabilities and housing for those with substance use disorder (SUD).
- Need for accessible housing for the elderly and for the disabled.

- Need for rehabilitation of the existing affordable housing stock.

DRAFT

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

To determine the level of need and gaps in Northern Panhandle's shelter inventory, housing inventory, and service delivery systems, the City of Wheeling relied upon stakeholder consultations, agency surveys, the 2022 Point-In-Time Count (PIT), 2022 Housing Inventory Count (HIC), Homeless Management Information System (HMIS), 2019 ALICE data (Asset Limited, Income Constrained, and Employed), 2022 Family Violence Prevention & Service Act (FVPSA) reporting, crime reporting data, and additional statistics shared by service providers. In addition, the City analyzed the 2017-2021 American Community Survey Data (ACS Data) and the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS).

DRAFT

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of Wheeling proposes to solicit HOME-ARP applications from non-profit and for-profit agencies, private developers and/or social service providers to undertake eligible HOME-ARP projects/activities. The City will release a Notice of the Funding Available under the HOME-ARP Program in the *Intelligencer/Wheeling News-Register* and post the notice on the City's website [www.wheelingwv.gov]. The City's Economic & Community Development Department (ECDD) staff will send out an email to organizations that have previously submitted funding requests or are known to serve qualifying populations within the Northern Panhandle. This will notify agencies, organizations, and interested parties of the availability of the HOME-ARP funds.

Potential applicants will be directed to the City's website to access HOME-ARP Program Guidelines, the Funding Application, the Application Review Process, and instructions on how to complete the application. Applicants will also be directed to the City of Wheeling's ECDD staff for related technical assistance.

The City will review the HOME-ARP Applications and rank them based on how funding request applications address the needs identified in the HOME-ARP Allocation Plan. Application review will consider how the proposed projects/activities will develop and preserve the affordable housing stock in the Northern Panhandle. In addition, the City will review how proposed projects/activities will incorporate comprehensive wrap-around supportive services to advance housing stability. The City will evaluate if the funding request applications will leverage HOME-ARP funds with other private and public funding sources.

Describe whether the PJ will administer eligible activities directly:

The City of Wheeling's Economic & Community Development Department will manage the HOME-ARP program's administration, monitoring, and planning components. The projects/activities will be carried out by subrecipients awarded HOME-ARP funds.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not Applicable. The City has not provided any HOME-ARP funds to subrecipient(s) or contractors prior to HUD's acceptance of the HOME-ARP Allocation Plan.

DRAFT

Use of HOME-ARP Funding

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 55,000.00	5%	
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	
Tenant Based Rental Assistance (TBRA)	\$ 0.00	0%	
Development of Affordable Rental Housing	\$ 939,594.00	85%	
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administration and Planning	\$ 110,510.00	10%	15%
Total HOME ARP Allocation:	\$ 1,105,104.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The City of Wheeling developed the HOME-ARP Budget based on the identified needs from consultation with community stakeholders, agency surveys, the assessment of the data obtained from the Point-In-Time Count (PIT), Continuum of Care Housing Inventory Count (HIC), American Community Survey Data (ACS), HUD Comprehensive Housing Affordability Strategy (CHAS), and other statistical data shared by consulting agencies.

The City will allocate 85% of its HOME-ARP allocation for the Development of Affordable Rental Housing, 5% for Supportive Services, and 10% for Administration and Planning.

Development of affordable rental housing eligible costs include acquisition, construction, rehabilitation, development costs, relocation, and operating cost assistance/reserves.

Supportive services may include some of the following eligible services: case management, housing search and counseling services, legal services, life skills training, transportation, childcare, education services, employment assistance and job training, credit repair, food, mental health services, outpatient health services, outreach services, substance abuse treatment services, mediation, landlord/tenant liaison, services for special populations, re-entry support and advocacy, and financial assistance costs.

The administration and planning set aside is to cover costs associated with the administration of the HOME-ARP Program by the City of Wheeling.

The lack of decent and safe housing stock throughout the Northern Panhandle that is affordable to low- and very low-income households was overwhelmingly mentioned during stakeholder consultations. Additionally, the need for comprehensive wrap-around supportive services from the emergency shelter space through transitional housing and into permanent housing placement was identified as a critical component to housing stability.

The lack of affordable housing options is a critical component of housing instability and undermines the efficiency and effectiveness of the Housing First Model. Moving individuals and households from emergency shelter into housing is paramount to successfully safeguarding housing stability. Realizing housing stability hinges on comprehensive and coordinated wrap-around services to the household. The lack of affordable housing options constricts the overall system by backing up emergency shelters, safe havens, and transitional housing. The production and preservation of affordable housing will reduce the number of persons or households and their amount of time spent in emergency shelters and transitional housing thereby opening shelter space to those currently unsheltered.

The City is not allocating HOME-ARP funds to the Acquisition and Development of Non-Congregate Shelters, Tenant Based Rental Assistance (TBRA), Non-Profit Operating, or Non-Profit Capacity Building based on the analysis of the needs for the City and the HOME Consortium.

Although the lack of emergency shelter in Hancock, Brooke, and Marshall Counties was another frequently identified need, there does not appear to be sufficient resources to undertake the acquisition, development, and support of new non-congregate shelters.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The 2022 Point-In-Time Count reported 89 persons or 81 households in Emergency Shelters and 11 persons or 9 households as unsheltered. The City of Wheeling and the Northern Panhandle housing markets are seeing housing options being reduced because of the increases in housing sales prices, increases in monthly rents, low vacancy rates, increases in utility costs, and inflation. These trends are leading to the lack of affordable housing opportunities and the increase of households becoming cost overburden.

Based on the statistics and the consultation process, the predominant need identified is for the development and preservation of housing affordable to low- and extremely low-income households. Also emphasized in achieving housing stability is the need for comprehensive wrap-around services from the shelter space through and following permanent housing placement.

HOME-ARP funds will be used to assist the extremely low-income and the most at risk of homelessness to achieve housing stability.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City of Wheeling estimates it will assist in the development of four (4) new affordable housing units using HOME-ARP funds. This number was developed based off an estimated cost of \$250,000 per unit, which would cover the acquisition, construction, rehabilitation, development costs, relocation, and operating cost assistance/reserves.

In addition, the City is allocating funds to provide supportive services to these units through coordination of existing service providers. These new affordable and/or rehabilitated existing units will be available to all HOME-ARP qualifying populations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The City of Wheeling is looking to leverage the HOME-ARP funds with other Federal, State, local, Foundation, private, etc. funding sources. The goal is to use these other funding sources to develop at least four (4) affordable housing units. If other funds are not available, the City will look to just fund projects with HOME-ARP funds only.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Not Applicable. The City of Wheeling does not intend to give preference to one qualifying population versus another because there is a need for aid among all four (4) qualifying populations. The needs for all four (4) qualifying populations are greater than the amount of HOME-ARP funds the City and the HOME Consortium have been allocated.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not Applicable.

DRAFT

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The City of Wheeling intends to use the Northern Panhandle CoC's (NPCoC) Coordinated Entry System (CES) for its HOME-ARP projects and activities. The CES covers the NPCoC's entire geographic area of operation (Hancock, Brooke, Ohio, Marshall, and Wetzel Counties) with two (2) established points of entry. The Greater Wheeling Coalition to End Homelessness (GWCH) is the main access point for all five (5) subpopulations permitted by HUD, including Category 4 households fleeing domestic violence when safety is not threatened. YWCA of Wheeling serves as the access point for households fleeing or attempting to flee domestic violence.

The accessibility of CES throughout the five-county region has been improved for persons who are unable to present in-person for assistance through the implementation of the LifeSize virtual conferencing center. LifeSize enables clients in the region's rural counties to virtually complete Centralized Intake and Assessment (CIA) using a private space in public, accessible locations, such as regional libraries or drop-in centers.

Coordinated Entry enables NPCoC providers and homeless assistance staff to make consistent decisions from available information, and to connect people in crisis efficiently and effectively to intervention that will rapidly end their homelessness. The CES approach also aligns with NPCoC goals to transform a crisis response system to improve outcomes for people experiencing a housing crisis.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

All HOME-ARP qualifying populations are eligible for a project or activity and will be included in the Northern Panhandle CoC (NPCoC) Coordinated Entry System (CES) process.

All participating members will ensure fair and equal access to CES system programs and services for all clients, regardless of actual or perceived race, color, religion, national origin, age, gender identity or expression, pregnancy, citizenship, familial status, household composition, disability, Veteran status, sexual orientation, or domestic violence status. To ensure fair access by individuals with disabilities, physical and communication accessibility barriers will be addressed by appropriate accommodation within the CES system. The NPCoC CES Policy and Procedure Manual has established protocols for fair and equal access to member housing and services.

All participating members will ensure that individuals are placed, served, and accommodated in accordance with their gender identity. This includes programs that have shared sleeping and/or bathing facilities. Programs may not make housing assignments or reassignments based solely on the complaints of another person, when the sole complaint is a client's gender identity, gender expression, or non-conformance with gender stereotypes. If an individual's gender identity, gender expression, or household composition creates challenging dynamics among residents within a facility, the host program will make every effort to accommodate the individual or assist in locating alternative accommodation that is appropriate and responsive to the individual's needs. Programs will take reasonable nondiscriminatory steps to address privacy and safety concerns and must ensure that their policies do not isolate, or segregate individuals based on gender identity. Referrals should never be made solely based on the complaints of other clients/residents.

The NPCoC requires service providers to practice a person-centered model that incorporates participant choice and inclusion of all homes subpopulations present in the NPCoC's area of operation, including homeless veterans, youth, families with children, individual adults, seniors, victims of domestic and sexual violence, and Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex (LGBTQI) individuals and families. All CoC members will ensure that all people have fair and equal access to the CES system process and all forms of assistance regardless of race, ethnicity, national origin, age, sex, familial status, religious preference, disability, type or amount of disability, gender identity, perceived gender identity, marital status, sexual orientation, or perceived sexual orientation.

The NPCoC ensures that persons with disabilities have equal access to the CES system through compliance with the requirement of Title II and Title III of the Americans with Disabilities Act. NPCoC does not discriminate against individuals with disabilities based on disability in the services, programs or activities. The NPCoC's CES Policy and Procedure Manual requires all member service providers to have written non-discrimination policies in place. As the main CES access point, Greater Wheeling Coalition to End Homelessness (GWCH) ensures effective communication with individuals with disabilities. GWCH has a wheelchair accessible ramp to its building. GWCH also employs case management staff who are proficient in foreign languages and can connect with sign language interpreters from a local university as needed.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

The City of Wheeling and the Northern Panhandle CoC (NPCoC) Coordinated Entry System (CES) method of prioritization by following the matching process and eventual referral linkage process which considers a set of prioritization criteria for each project type. The order of client priority on the prioritization list will not be based on disability type or diagnosis.

The NPCoC's CES utilizes a standardized assessment pre-screening process for all five (5) subpopulations permitted by HUD. Following initial pre-screening assessment, priority is based on the two (2) standardized assessments, the Self Sufficiency Assessment Matrix (SSAM) and the Vulnerability Index-Service Prioritization Decision Assessment Tool (VI-SPDAT). The SSAM assessment criteria is used to determine each participant's level of barriers to housing and to objectively link households to the most appropriate housing solution available. The VI-SPDAT is administered to chronically homeless individuals and ensures their prioritization for placement into homeless programs based on level of acuity and need.

The NPCoC ensures persons most in need of assistance are prioritized for care during monthly Provider Committee meetings using established prioritization standards developed for the NPCoC. These standards consider assessment results, levels of acuity, length of time homeless, and special populations.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not Applicable. The City and the Northern Panhandle HOME Consortium intends to only use the Coordinated Entry System (CE) Process for the HOME-ARP funded projects.

DRAFT

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City of Wheeling and the HOME Consortium is not intending to limit eligibility for HOME-ARP rental housing projects to a particular qualifying population or specific subpopulation. The need for affordable rental housing has been identified for all qualifying populations. The City will solicit proposals for rental housing projects for all qualifying populations. Evaluations of applications will be made, and selection will be based on the best proposal submitted.

The City is not allocating HOME-ARP funds for the acquisition and development of non-congregate shelters.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not Applicable. The City does not intend to implement a limitation on the HOME-ARP Program.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not Applicable.

HOME-ARP Refinancing Guidelines

The City of Wheeling and the HOME Consortium does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. Not Applicable.

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

Not Applicable.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not Applicable.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Not Applicable.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

Not Applicable.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not Applicable.

- ***Other requirements in the PJ's guidelines, if applicable:***

Not Applicable.

Appendix

Attached are the following items:

- SF 424 Form
- SF 424-B Form
- SF 424-D Form
- Certifications
- Resolution
- Citizen Participation Documentation

DRAFT

DRAFT



HUD SF 424 Form

DRAFT



HUD SF 424-B Form

DRAFT



HUD SF 424-D Form

DRAFT



Certifications

DRAFT



Resolution

DRAFT



Citizen Participation Documentation

DRAFT



Agency Surveys/Consultation
