West Virginia Housing Development Fund

HOME and HTF
Rental Housing Program Guidelines

2017

THIS DOCUMENT SETS FORTH THE REQUIREMENTS FOR THE STATE'S AWARDS OF HOME AND HTF FUNDS FOR RENTAL PROJECTS

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1. Summary

The West Virginia Housing Development Fund (the Fund) supports the rehabilitation and new construction of affordable rental housing for low- and very low-income households with its annual funding allocation from the U. S. Department of Housing and Urban Development's (HUD) HOME Investment Partnerships Program (HOME) and Housing Trust Fund Program (HTF). HOME was created under Title 11 of the Cranston-Gonzalez National Affordable Housing Act of 1990 with implementing regulations at 24 CFR Part 92; HTF was established under section 1338 of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992, as amended.

HOME

The HOME Program is intended to achieve:

Rental

- To expand the supply of decent, safe, sanitary, and affordable housing with the primary focus on housing for low, very low, and extremely low-income families.

Operating

- Expand the capacity of Community Housing Development Organizations (CHDO) to plan and implement strategies for developing affordable housing.

The Fund's HOME funds will be used to provide financing and gap financing to projects located in West Virginia. The program will target housing in eligible areas that is affordable to people who are at or below 60% of area median income ("AMI") at initial occupancy, and whose income may not exceed 80% of AMI for the county thereafter. In exchange for low-cost permanent financing, property owners will agree to rent restrictions and to rent to low-income tenants for at least 20 years for new construction projects and up to 15 years for rehabilitation projects. Projects are monitored for compliance during the affordability period. Project developers, owners, and sponsors must coordinate funder's requirements when there are multiple funding sources.

HTF

The HTF program is intended to achieve:

Rental

- Increase and preserve the supply of decent, safe, sanitary, and affordable housing, with primary attention to rental housing for extremely low-income and very low-income households, including homeless families.
- Operating cost assistance for HTF-assisted rental housing that do not receive project-based subsidy(ies).

In any fiscal year in which the total amount available for allocation of HTF funds is less than $1,000,000,000, the Fund must use 100% of its HTF grant for the benefit of extremely low-income families or families with incomes at or below the poverty line (whichever is greater). In any fiscal year in which the total amount available for allocation of HTF funds is greater than $1,000,000,000, the Fund must use at least 75% of its HTF grant for the benefit of extremely low-income families or families at or below the poverty line; moreover, no more than 25% of its HTF grant will be for the benefit of very low-income families.

The Fund's HTF funds will be used to provide financing and gap financing to projects located in West Virginia. The program will target housing in eligible areas that is affordable to people who are at or below 30% of area median income ("AMI") at initial occupancy for the county. In exchange for low-cost permanent financing, property owners will agree to rent restrictions and to rent to low-income tenants for 30 years for new construction and rehabilitation projects. Projects are monitored for compliance during the affordability period. Project developers, owners, and sponsors must coordinate funder's requirements when there are multiple funding sources.

This document sets forth the requirements for the Fund's awards of HOME and/or HTF funds for rental projects.

2. Application and Evaluation Procedure

The Fund will generally issue a Rental Housing Request for Proposals (RFP) on an annual basis. The RFP will outline specific application deadlines, any funding focus (e.g., by project type, population served, etc.), and other special considerations applied to a given funding round. Applications for HOME and/or HTF Rental Housing funding can be submitted at any time throughout the program year. The Fund will process, score, and rank RFPs at specific times throughout the year: February 15, 2017 (for RFPs received from issuance date through February 15, 2017); May 31, 2017 (for RFPs received from February 16, 2017, through May 31, 2017); and October 31, 2017 (for RFPs received from June 1, 2017, through October 31, 2017). If submitted outside of an RFP period, the Fund may consider an application based on the availability of funding, or such applications will be reviewed as a part of the Fund's next Rental Housing RFP process.

A. Funding Availability

Upon submission of a proposal for HOME and/or HTF funds, Fund staff will conduct a review and analysis of the project and developer(s) as presented in the proposal. Proposals will be scored based on criteria in the RFP. Regardless of strict numerical ranking, the scoring does not operate to vest in an applicant or project any right to a commitment of HOME and/or HTF funds. The Fund will, in all instances, commit HOME and/or HTF funds consistent with sound and reasonable judgment, prudent business practices, and the exercise of its inherent discretion.

Projects seeking HOME and/or HTF funds prior to the receipt of all other funding sources, including federal tax credit reservations, may be provided with non-binding Letters of Intent. Further, eligible Rental Housing projects receiving Letters of Intent, said letters may be contingent upon the 1) Approval of the Action Plan; 2) the Fund's receipt of HOME and/or HTF funds from HUD; 3) the applicant's award from the Fund for LIHTC, if applicable; 4) the Fund's receipt of the HUD Authority to Use Grant Funds following completion of the Environmental Review process; and other items noted in the Letters of Intent.

B. Submission of Materials

All HOME and/or HTF Rental Housing Program applicants will need to comply with the submission criteria set forth in the Fund's RFP, which is located under the HOME Program at www.wvhdf.com. The Fund reserves the right to require the submission of additional information as needed to complete project underwriting.

3. Project Funding Requirements

A. Eligibility Criteria

Eligible Applicants

HOME

The Fund will fund developers and owners of affordable rental housing, including for-profit developers, nonprofit developers, and Fund-designated CHDOs, with HOME Rental Housing Program funds. Public housing units supported by Public Housing Capital or Operating funds authorized by the 1937 Act are not eligible for HOME; however, non-public housing units owned and developed by a public housing authority are eligible. Prior to committing funds, the Fund will review the status of any organization seeking funds from the CHDO set-aside to ensure that it meets all HOME requirements and that it has sufficient staff capacity to carry out the project.

HTF

The Fund will fund developers and owners of affordable rental housing, including for profit developers, nonprofit developers, and public housing authorities with HTF Rental Housing Program funds. Operating Cost Assistance is available for HTF-assisted units for which project-based subsidy is not available.

HTF funds may be used for new construction or rehabilitation of public housing units only in accordance with the following, as noted in 24 CFR 93.203:

- HTF funds may be used for new construction of public housing as part of the Choice Neighborhoods (Choice) program under a HUD appropriation act or for new public housing units that have been allocated and will receive low-income housing tax credits under section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42).

- HTF funds may be used for the rehabilitation of existing public housing units in which the public housing assistance will be converted and used at the properties under the Rental Assistance Demonstration (RAD) program under HUD's 2012 Appropriations Act (Pub. L. 112-55, 125 Stat. 552, approved November 18, 2011) or subsequent statutes. HTF funds may also be used for the rehabilitation of existing public housing under the Choice program, and of existing public housing units that have been allocated and will receive low-income housing tax credits under section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42).

- The public housing units constructed using funds under this part must replace units that were removed from a public housing agency's public housing inventory as part of a Choice program grant, or as part of a mixed-financed development under section 35 of the 1937 Act. The number of replacement units cannot be more than the number of units removed from the public housing agency's inventory. The public housing units constructed or rehabilitated using funds under this part must receive Public Housing Operating Fund assistance (and may receive Public Housing Capital Fund assistance) under section 9 of the 1937 Act. These units cannot receive operating costs assistance or operating cost assistance reserves under this part.

Project Location

Projects must be located in the State of West Virginia.

Project Types

Funds will be provided for acquisition, new construction, and rehabilitation of multifamily residential rental projects. While the Fund will entertain any proposals meeting its criteria, in practice most projects will also require other investments to be economically feasible. This may include projects also funded with (a) other federally-regulated affordable housing programs such as, but not limited to, LIHTC, HUD Section 202, Section 811, HOPE VI, or Choice Neighborhoods; and (b) non-federal funds such as, but not limited to owner's equity and deferred developer fee.

Parameters of HOME Funding

The Fund may establish a maximum cap on its investment in a single development. Such a limit will be based on the availability of funding and other Fund priorities.

<u>HOME</u>

Applications must include an investment of no less than $1,000 in HOME funds per HOME unit. In no case will the Fund investment exceed the maximum HOME investment allowed under 24 CFR 92.250.

HTF

Applications must include an investment of no less than $1,000 in HTF fund per HTF unit. In no case will the Fund investment exceed the maximum HTF investment allowed under 24 CFR 93.300.

B. Eligible Costs

Costs funded with HOME funds must be eligible according to HOME Final Rule 24 CFR 92.206; costs funded with HTF funds must be eligible according to 24 CFR 93.201. The following additional limitations also apply:

i. HOME and/or HTF funds shall not be used for luxury improvements according to 24 CFR 92.205 and 24 CFR 93.200, respectively.

ii. With the exception of a rent-up reserve to cover initial operating deficits allowed under 24 CFR 92.206(d)(5) and 24 CFR 93.201(d)(5), HOME and HTF funds, respectively, shall not be used to capitalize reserves.

iii. Acquisition costs shall be supported by an independent appraisal of the property. Acquisition costs exceeding the appraised value of the property will be ineligible for HOME and/or HTF funding reimbursement. When a project's sources include RD or other HUD funding, the RD or HUD appraisal methodology will apply.

iv. HOME and/or HTF funds shall not be used for non-residential accessory structures such as free-standing community/leasing buildings, garages, carports, or maintenance structures. HOME and HTF funds may be used for community space or common laundry facilities included in residential buildings.

Fund Project-Related Soft Costs

The HOME and HTF programs allow the Fund to include, as project costs, its internal soft costs specifically attributable to a HOME and/or HTF project, as applicable. These may include, but are not limited to, consulting, legal, inspection, and staff costs associated with reviewing, processing, and overseeing the award of funds to the project. During underwriting, the Fund will provide a budget allowance for "Fund Due Diligence & Legal Costs" in the project's sources and uses. The project's estimated annual expense information will include an annual per-unit monitoring fee, which is noted in the RFP (Property Estimated Annual Expense Information page).

Cost Reasonableness

Per the requirements of 24 CFR 92.250(b) for HOME, 24 CFR 93.300(b) for HTF, and 2 CFR 225, all project costs must be reasonable, whether or not paid directly with HOME and/or HTF funds.

The Fund will review project costs, including hard and soft costs, to evaluate their reasonableness and may, at its option, require applicants to obtain additional quotes, bids, or estimates of costs. Fund staff must be allowed the opportunity to conduct a cost analysis to determine costs reasonableness. Applications may be determined ineligible if access is not granted or costs are determined to be unreasonable.

Identity of Interest

Owners must disclose any identity of interest situations that may occur when contracting with related companies during either the development or ongoing operation of the project.

C. Property Standards

To meet both HOME and HTF regulations and Fund goals, all projects must meet certain physical standards intended to provide quality affordable housing that is durable and energy efficient.

i. Construction must meet all local codes.

For projects obtaining permits on or after August 1, 2016, the Fund requires all HOME and HTF funded projects to comply with he following codes with amendments:

- 2015 International Building Code
- 2015 International Residential Code
- 2015 International Mechanical Code
- 2009 International Energy Conservation Code
- 2015 International Existing Building Code
- 2015 International Plumbing Code
- 2015 International Fuel Gas Code
- 2015 International Property Maintenance Code
- 2014 National Electric Code
- 2009 ANSI A117.1 American National Standards for Accessibility & Usable Buildings & Facilities

ii. All projects must meet applicable Section 504/UFAS requirements. New construction projects with five or more HOME- and/or HTF-assisted units must provide 5% of the project's units for physically-disabled occupants and another 2% of the project's units designed to be accessible to those with visual or hearing impairments. Additionally, covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements required by the Fair Housing Act as outlined in 24 CFR 100.205.

iii. All projects must have a fully-equipped laundry room if washer/dryer connections are not provided in each unit.

D. Unit Allocation

In general, HOME and/or HTF units will be "floating units" and evenly distributed among the unit types in the development. If the project's units are not comparable, "fixed units" must be designated. In the case of projects with comparable units, the Fund will designate units as HOME-assisted and/or HTF-assisted in proportion to the percentage of the respective investment in the transaction. For example, if HOME represents 10% of the project's total HOME-eligible cost, at least 10% of the units will be HOME units, and likewise for HTF.

HOME-assisted units shall be designated as either "High HOME units" or "Low HOME units." In projects with five or more HOME-assisted units, at least 20% of the HOME-units, rounded up to a whole number, must be designated as Low HOME units. Generally, the Fund will designate the minimum number of Low-HOME units required unless the applicant requests that additional Low-HOME units be designated to coordinate income and rent restrictions with other project requirements.

E. Income and Rent Restrictions

To qualify as affordable housing, HOME and/or HTF units must be rented only to households with certain incomes at rents regulated by each program to be affordable to low income households.

Income Limits

i. High HOME units must be occupied by tenants with household incomes at or below 60% of AMI at initial occupancy, and whose income may not exceed 80% of AMI for the county, as adjusted by family size, thereafter; and

ii. Low HOME units must be rented exclusively to tenants with household incomes at or below 50% AMI for the county, as adjusted by family size.

iii. In any fiscal year in which the total amount available for allocation of HTF funds is less than $1,000,000,000, HTF units must be occupied by extremely low-income families (at or below 30% AMI) or families with incomes at or below the poverty line, whichever is greater.

iv. In any fiscal year in which the total amount available for allocation of HTF funds is greater than $1,000,000,000, at least 75% of HTF units must be occupied by extremely low-income families or families with incomes at or below the poverty line, whichever is greater; and no more than 25% of HTF units may be occupied by very low-income families.

Rent Limits

<u>HOME</u>

i. High-HOME units must be rented at or below the High-HOME rent as published by HUD. In general, HUD will calculate the High-HOME rent to be the lesser of the applicable Fair Market Rent or a rent equal to 30% of 65% of the adjusted area median income, adjusted for unit size.

ii. Low-HOME units must be rented at or below the Low-HOME rent as published by HUD. In general, HUD calculates the Low-HOME rent to be the lesser of the applicable Fair Market Rent of a rent equal to 30% of 50% of the area median income, adjusted for unit size. The only exception is for those units receiving federal or State project-based rental subsidy, and the very low-income family pays as a contribution toward rent not more than 30% of the family's adjusted income, then the maximum rent (i.e., tenant contribution plus project-based rental subsidy) is the rent allowable under the federal or State project-based rental subsidy program.

<u>HTF</u>

i. Extremely low-income tenants: The HTF rent plus utilities shall not exceed the greater of 30% of the federal poverty line or 30% of the income of a family whose income equals 30% of the median income for the area as determined by HUD, with adjustments for the number of bedrooms in the unit.

ii. Very low-income tenants: As applicable, the HTF rent plus utilities of a very low-income tenant shall not exceed 30% of the income of a family whose annual income equals 50% of the median income for the area as determined by HUD, with adjustments for the number of bedrooms in the unit.

iii. If the HTF unit receives Federal or State project-based rental subsidy, and the tenant pays as a contribution toward rent not more than 30% of the tenant's adjusted income, the maximum rent is the rent allowable under the Federal or State project-based rental subsidy program.

<u>HOME and HTF</u>

The Fund must approve the project's rent schedule annually.

Utility Allowances

The High-HOME, Low-HOME, and HTF rent limits are gross rent limits. The actual rent collected from a tenant must be adjusted taking into account an allowance for tenant paid utilities.

HOME and HTF regulations, 24 CFR 92.252(d) and 24 CFR 93.302(c), respectively, require that the utility allowance (UA) for the project be based on the type of utilities used at the project. The UA is to be established using a project-specific methodology and based on actual utility usage at the property or estimates an allowance based on project-specific factors such as size, orientation, building materials, mechanical systems, and construction quality, as well as local climate conditions.

Public Housing Authority UAs are no longer an acceptable method of calculating UAs.

The following methodologies, used in other Federal housing programs, will meet HOME and HTF regulatory requirements. The same methodology must be used for all HOME and/or HTF units within a single project.

i. HUD Utility Schedule Model: The HUSM enables users to calculate utility schedules by housing type after entering utility rate information (tariffs). This model is based on climate and survey information from the U. S. Energy Information Administration of the Department of Energy and it incorporates energy efficiency and Energy Star data. This model is allowed for LIHTC projects per IRS regulations at 26 CFR 1.42-10(b)(4)(D). The HUSM and use instructions can be accessed on HUD User at https://www.huduser.gov/portal/resources/utilallowance.html. The HUSM is available as either a spreadsheet model in MS EXCEL or a web-based model on HUD User at https://www.huduser.gov/portal/datasets/husm/uam.html.

ii. Multifamily Housing Utility Analysis: In 2015, HUD published Multifamily Notice H-2015-4 to provide instructions to owners and management agents for completing the required utility analysis. This analysis is also used for the USDA Rural Housing Service program and allowed for LIHTC projects per IRS regulations at 26 CFR 1.42-10(b)(3). This method is applicable for the following programs: Project-based Section 8, Section 101, Section 202/162, Section 811, Section 236, and Section 221(d)(3).

iii. Utility Company Estimate (26 CFR 1.42-10(b)(4)(B)): UA based on estimates obtained from a local utility company for each of the utilities used in the project. IRS regulations state that the estimate must be obtained in writing and must be based on the estimated cost of that utility for a unit of similar size and construction for the geographic area in which the building containing the unit is located.

iv. Energy Consumption Model (Engineer Model) (26 CFR 1.42-10(b)(4)(E)): UA based on an energy and water and sewage consumption and analysis model (energy consumption model) prepared by a properly licensed engineer or a qualified professional. IRS regulations require that such professionals be independent from the property owner and they specify the building factors that must be included in the model.

The Fund must approve the project's utility allowance.

Income Verification

All projects shall use the HUD Part 5 definition of income for determining income eligibility. Prior to signing a lease, income must be verified for all new tenants using at least two months of source documentation in accordance with 24 CFR 92.203(a)(1)(i) for HOME and 24 CFR 93.151(d) for HTF. When available, the Fund prefers the use of third-party verification as the primary means of documenting income.

During the period of affordability, the income of in-place tenants must be recertified using source documentation at least every sixth year of the project's affordability period (e.g., in the sixth year, all in-place tenants must be recertified using source documentation even if a given tenant is only in his/her second year of occupancy). In other years, owners must recertify the income of existing tenants annually in accordance but may use one of the options in 92.203 and 93.151, as applicable, unless the Fund requires that a project use one of the methods exclusively:

i. Re-verifying income annually through source documentation;

ii. Obtaining a written statement from the household regarding annual household income. However, source documentation for all existing tenants must be reviewed at least every 6th year of the affordability period; or

iii. Obtaining a written statement from the administrator of a government program under which the households receive benefits and which examines each year the annual income of the household.

Rent Adjustments

HUD provides HOME and HTF income and rent limits on an annual basis. Fund staff will provide this information to owners annually. Utility allowances will also be reviewed and adjusted, as needed, annually. Owners must obtain approval before implementing HOME and HTF unit rent increases. Owners shall also provide not less than 30 days' written notice to tenants upon receiving Fund approval for HOME and HTF unit rent increases.

HOME

HOME-assisted units are considered to be compliant despite a temporary increase in income exceeding HOME requirements for existing tenants. However, in such cases there are detailed requirements about how to adjust the rent of such tenants and how to restore overall project compliance. These are outlined in the HOME Model Guide "Compliance in HOME Rental Projects: A Guide for Property Owners," which is available online at:

http://portal.hud.gov/hudportal/documents/hudoc?id=19760_2009homerentalpo.pdf

For projects with floating units, when an existing tenant's income increases beyond 80% AMI adjusted for household size, the tenant's gross rent will be increased to the lesser of the unassisted market rent for the unit or 30% of the tenant's adjusted household income. When the income of an existing tenant of a Low-HOME unit increases above 50% AMI but is below 80% AMI, the rent for that tenant will be increased to the High-HOME rent. In both cases, the next available unit in the project should be rented, based on the project's compliance needs, as a Low- or High-HOME unit.

Notwithstanding, over-income tenants of HOME-assisted units that have been allocated low-income housing tax credits must pay rent according to Section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42).

HTF

In the event a tenant occupying an HTF unit becomes over-income, the HTF-assisted unit continues to qualify as affordable housing despite a temporary noncompliance caused by increases in the existing tenant's income if actions satisfactory to HUD are being taken to ensure that all vacancies are filled in accordance with 24 CFR 93.302 until the noncompliance is corrected.

F. Environmental Review Requirements

Federally-assisted projects are subject to a variety of environmental requirements. Developers should be familiar with these requirements and are strongly encouraged to discuss any questions they have with Fund staff prior to entering into a purchase agreement or submitting an application.

i. All Rental Housing projects shall be implemented in accordance with environmental review regulations as defined in 24 CFR Part 58.

ii. The Fund shall be responsible for conducting the environmental review and completing all necessary public notifications, and the request for release of funds (RROF), as applicable, from HUD. The applicant is responsible for cooperating with the Fund in the environmental review process and providing information necessary for the Fund to fulfill its responsibilities under Part 58 and other applicable regulations.

iii. Submitting an application for HOME and/or HTF funds triggers environmental review requirements under 24 CFR Part 58, including the National Environmental Policy Act (NEPA). Once an application for federal funds is submitted, a project proposal is now subject to the environmental review requirements and requires an environmental clearance and issuance of a Release of Funds (ROF), as applicable, by the U. S. Department of Housing and Urban Development.

iv. Developers are prohibited from undertaking or committing or expending any funds (including non-federal funds) to any physical or choice-limiting actions on the site prior to an environmental clearance as required by Part 58. Physical and choice-limiting actions include, but are not limited to, property acquisition, demolition, movement, rehabilitation, conversion, repair or construction. This prohibition applies regardless of whether federal or non-federal funds are used, and taking a choice limiting action prior to completion of the required environmental clearance process will result in the denial of any HOME and/or HTF funds from the Fund.

G. Other Federal Requirements

Nondiscrimination and Equal Opportunity

The following federal nondiscrimination and equal opportunity guidelines apply to all Rental Housing projects and affect both development and operation of assisted housing:

i. The Fair Housing Act (42 U.S.C. 3601-19) and implementing regulations at 24 CFR part 100 et seq.;

ii. Executive Order 11063, as amended by Executive Order 12259 (3 CFR, 1959-1963 Comp., p. 652 and 3 CFR, 1980 Comp., p. 307) (Equal Opportunity in Housing Programs) and implementing regulations at 24 CFR part 107;

iii. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4) (Nondiscrimination in Federally Assisted Programs) and implementing regulations at 24 CFR part 1

iv. The Age Discrimination Act of 1975 (42 U.S.C. 6101-6107) and implementing regulations at 24 CFR part 146

v. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at part 8 of this title

vi. Title II of the Americans with Disabilities Act, 42 U.S.C. 12101 et seq.; 24 CFR part 8; Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135;

vii. Executive Order 11246, as amended by Executive Orders 11375, [[Page 41]] 11478, 12086, and 12107 (3 CFR,1964-1965 Comp., p. 339; 3 CFR, 1966- 1970 Comp., p. 684; 3 CFR, 1966-1970 Comp., p. 803; 3 CFR, 1978 Comp., p. 230; and 3 CFR, 1978 Comp., p. 264, respectively) (Equal Employment Opportunity Programs) and implementing regulations at 41 CFR chapter 60;

viii. Executive Order 11625, as amended by Executive Order 12007 (3 CFR, 1971- 1975 Comp., p. 616 and 3 CFR, 1977 Comp., p. 139) (Minority Business Enterprises); Executive Order 12432 (3 CFR, 1983 Comp., p. 198) (Minority Business Enterprise Development).

ix. Executive Order 12138, as amended by Executive Order 12608 (3 CFR, 1977 Comp., p. 393 and 3 CFR, 1987 Comp., p. 245) (Women's Business Enterprise). The nondiscrimination provisions of Section 282 of the National Affordable Housing Act of 1982.

Uniform Relocation Act (URA)

All Rental Housing projects fall under requirements of the URA. Applicants must further document that any purchase of property meets the requirements of URA, including provision of notices to the seller identifying the transaction as a voluntary sale not under the threat of eminent domain. To ensure compliance with URA, applicants should consult the Tenant Relocation portion of the RFP to understand the requirements of URA prior to submitting an application involving an occupied property.

Davis-Bacon

Davis-Bacon federal prevailing wage requirements shall apply to all Rental Housing projects with 12 or more units assisted with HOME funds. See www.wvhdf.com for further information.

Minority Business Enterprise and Women Business Enterprise (MBE/WBE) Plan

Developers must maintain a MBE/WBE plan that demonstrates marketing and solicitation of MBE/WBE businesses and contractors for the construction of the project. See www.wvhdf.com for further information.

Section 3

Developers must maintain a Section 3 plan that demonstrates a marketing plan to include Section 3 contractors and all tiers of subcontractors in the construction of the project. See www.wvhdf.com for further information.

Excluded Parties

The Fund will not fund projects owned, developed, or otherwise sponsored by any individual, corporation, or other entity that is suspended, debarred, or otherwise precluded from receiving federal awards. Nor may the owner contract with any other entity (including but not limited to builders/general contractors, property management companies, or other members of the development team) that are suspended, debarred, or otherwise so precluded. Similarly, the general contractor will be required to determine that subcontractors are not so precluded.

4. Ongoing Project Requirements

A. Project Completion Deadline and Period of Affordability

<u>HOME</u>

The period of affordability will be based on the date of project completion as defined by 24 CFR 92.2 which, among other things, requires that all construction activity be complete, all HOME funds drawn from the U. S. Treasury, and project completion information be entered into HUD's IDIS reporting system. For rental projects, project completion occurs upon completion of construction and before occupancy, and units may be marked vacant in IDIS until complete beneficiary data is received. Project completion must occur within 2 years of the date of commitment of funds to the project. If the Owner fails to meet this 2-year deadline, it must repay to the Fund any HOME funds disbursed for the project. In accordance with the minimum requirements of 24 CFR 92.252(e), rehabilitated and new construction rental projects funded with HOME shall maintain HOME affordability requirements for a period of up to 20 years as regulated by 24 CFR 92.252.

<u>HTF</u>

The period of affordability will be based on the date of project completion as defined by 24 CFR 93.2, which, among other things, requires that all construction activity be complete, all HTF funds drawn from the U. S. Treasury, and project completion information be entered into HUD's IDIS reporting system. For rental projects, project completion occurs upon completion of construction and before occupancy, and units may be marked vacant in IDIS until complete beneficiary data is received. Project completion must occur within 2 years of the date of commitment of funds to the project. If the Owner fails to meet this 2-year deadline, it must repay to the Fund any HTF funds disbursed for the project. In accordance with the minimum requirements of 24 CFR 93.302(d), rehabilitated and new construction rental projects funded with HTF shall maintain HTF affordability requirements for a period of 30 years as regulated by 24 CFR 93.302.

B. Initial Occupancy Deadlines

<u>HOME</u>

In accordance with 24 CFR 92.252, HOME-funded rental projects must comply with the following deadlines and requirements as evidenced by occupancy of tenants with a written lease that complies with the requirements of 24 CFR 92.253:

i. Within 6 months from the date of project completion, if a rental unit remains unoccupied, the Owner will provide to the Fund information about current marketing efforts and, if appropriate, an enhanced plan for marketing the unit so that it is leased as quickly as possible.

ii. Within 18 months from the date of project completion, if efforts to market the units are unsuccessful and units remain unoccupied by an eligible tenant, the Fund will require repayment of all HOME funds invested in each vacant unit. A unit that has not served a low- or very low-income household, as applicable, has not met the purposes of the HOME program. Therefore, the costs associated with the unit are ineligible.

HTF

HTF-funded rental projects must comply with the following deadlines and requirements as evidenced by occupancy of tenants with a written lease that complies with the requirements of 24 CFR 93.303:

i. Within 6 months from the date of project completion, if a rental unit remains unoccupied, the Owner will provide to the Fund information about current marketing efforts and, if appropriate, an enhanced plan for marketing the unit so that it is leased as quickly as possible.

ii. Within 18 months from the date of project completion, if efforts to market the units are unsuccessful and units remain unoccupied by an eligible tenant, the Fund will require repayment of all HTF funds invested in each vacant unit. A unit that has not served an extremely- or very low-income household, as applicable, has not met the purposes of the HTF program. Therefore, the costs associated with the unit are ineligible.

C. Marketing and Leasing Materials

The owner/developer must establish a written tenant selection plan consistent with the requirements of 24 CFR 92.253(d) for HOME and 24 CFR 93.303 for HTF. Among other requirements, the tenant selection plan must, insofar as is practical, provide for the selection of tenants from a project's waiting list in chronological order of their applications and provide written notification to any rejected applicant of the reason for their rejection.

All HOME- and/or HTF-funded projects must establish an Affirmative Fair Housing Marketing Plan detailing marketing procedures to attract eligible occupants without regard to race, color, national origin, sex, religion, familial status, disability, or sexual orientation. Affirmative Fair Housing Marketing Plans shall include all required aspects as stated in 24 CFR 92.351(a)(2) for HOME and 24 CFR 93.350 for HTF. The Fund will accept affirmative marketing plans using the most recent version of form HUD-935.2A or HUD -935.2B, as applicable, or in another format as may be specified by the Fund from time to time. The HUD forms are available at:

http://portal.hud.gov/hudportal/documents/huddoc?id=935-2a.pdf
http://portal.hud.gov/hudportal/documents/huddoc?id=935-2b.pdf

Leases between the tenant and owner shall be for one year, unless by mutual agreement between the tenant and the owner. Owners are required to provide 30 days' written notice prior to terminating or refusing to renew the lease. Owners are prohibited from including unfair provisions in HOME project leases. In accordance with the provisions of 24 CFR 92.253 for HOME and 24 CFR 93.303 for HTF, the following terms are prohibited from HOME and/or HTF project leases:

i. agreement to be sued;

ii. treatment of personal property;

iii. excusing owner from responsibility;

iv. waiver of notice;

v. waiver of legal proceedings;

vi. waiver of a jury trial;

vii. waiver of right to appeal court decision; and

viii. tenant chargeable with cost of legal actions regardless of outcome.

D. Prohibition on Certain Fees to Tenants

Pursuant to 24 CFR 92.214 for HOME and 24 CFR 93.204 for HTF, program participants may not charge fees to program beneficiaries to cover administrative costs related to the cost of administering the HOME and/or HTF program. Specifically, rental project owners may not charge tenants fees that are not customarily charged to tenants of rental housing (e.g., laundry room access fees). However, owners may charge fees for the following:

i. Reasonable application fees to prospective tenants;

ii. Parking fees to tenants only if such fees are customary for rental housing projects in the neighborhood; and

iii. Fees for services such as bus transportation or meals, as long as the services are voluntary and fees are charged only for services provided.

The Fund will review and approve fee schedules annually to ensure that any fees charged in addition to rent are permissible under the applicable HOME and/or HTF requirements and whether proposed fees are reasonable and customary based on market comparisons.

E. Reporting and Recordkeeping

To allow effective oversight of funded projects and document compliance with applicable HOME and/or HTF requirements, all projects must submit periodic reports to the Fund. While this section outlines standard reporting requirements, the Fund reserves the right to require additional reporting or to alter the reporting format or frequency based on future changes to HOME and/or HTF requirements or Fund policy. Additionally, the Fund reserves the right to require additional or more frequent reporting for projects with compliance deficiencies.

i. Owners are required to report quarterly during the development phase and lease-up phase. Quarterly reports will be due on the 15th of the month following the end of the prior quarter (e.g., by April 15th reports on the first quarter are due).

- During the construction phase, owners must provide monthly reports detailing construction progress and barriers to progress, copies of invoices being paid, and evidence of appropriate lien waivers.

- During the initial phase of lease-up, the Fund may request owners to provide monthly or quarterly reports detailing the number of additional leases, total project leases, marketing activity, and monthly income and expenses.

- Once the owner has leased 100% of units, leasing and marketing reporting will be required annually.

ii. Annual Reports shall be required for all HOME and/or HTF projects, and shall include an Annual Occupancy Report, utility allowance documentation, and examples of marketing.

iii. The Fund may require more frequent reporting due to findings identified during annual monitoring, or findings identified during quarterly reports submitted during the development and lease-up phases.

iv. All HOME and/or HTF projects with ten (10) or more HOME- and /or HTF-assisted units shall be required to submit an annual audit prepared by an independent Certified Public Accountant within 180 days of the end of its fiscal year or statement of financial condition, as applicable.

v. Owners and developers shall allow the Fund, HUD, State of West Virginia, the Comptroller General of the United States (aka the GAO), and all other pertinent federal or State agencies or their designated representative the right to inspect records and property.

vi. Owners must annually submit any updates to their Tenant Selection Policy and Affirmative Fair Housing marketing plan and must maintain records of annual efforts to affirmatively further fair housing in accordance with 24 CFR 92.351. Updates must clearly detail all changes.

vii. The Fund may periodically require owners to obtain a capital needs assessment prepared by an independent third-party architect, engineer, or other qualified firm approved by the Fund. Such capital needs assessments shall be used for the purposes of determining the adequacy of the Replacement Reserve, taking into account its existing balance, planned deposits, and anticipated future capital replacement costs for the Project.

If the capital needs assessment indicates the Replacement Reserve is not sufficient to address anticipated capital costs during the Affordability Period, the owner must, at the Fund's option, either make an additional deposit or increase its annual deposits sufficient to meet any underfunding. If an additional deposit is required by the Fund, the owner (or the Guarantors) must replenish the Replacement Reserve Account within six months.

F. Conflict of Interest

To comply with HOME and HTF requirements and to maintain a high standard of accountability to the public, conflicts of interest and perceived conflicts of interest must be avoided.

i. Owners shall maintain compliance with all HUD conflict of interest provisions as stated in 92.356 for HOME and 93.353 for HTF.

ii. Developers and owners with employees, family members, consultants, or agents who are otherwise eligible to occupy HOME- and/or HTF-funded units must receive approval from the Fund before entering into a lease with HOME and/or HTF eligible employees, family members, consultants, or agents. 24 CFR 92.356(f) provisions apply to all HOME projects; 24 CFR 93.353(f) provisions apply to all HTF projects.

5. Structure of Transaction

A. Loan Types and Terms

The Fund will provide HOME and/or HTF funds in the form of a loan to the entity that owns the property. No grants will be awarded, and funding commitments are not transferable without prior written Fund approval.

The Fund's HOME and/or HTF loan is intended as construction/permanent financing. Proceeds of the HOME and/or HTF loan will only be released in conjunction with approved monthly construction draws and/or submission of invoices for approved soft costs and satisfaction of all requirements outlined below.

In all cases, the HOME and/or HTF loan will:

i. Have a term of 15 to 40 years, which will be determined by underwriting evaluation;

ii. Be repayable in full upon sale, refinancing, or transfer of the property or upon maturity, whichever occurs first; and

iii. Secured with a deed of trust, promissory note, and appropriate UCC liens. Deeds of Trust will be recorded in the appropriate county and generally may be subordinate only to an amortizing permanent first mortgage and a temporary bank construction loan, all of which must be approved by the Fund, if applicable.

The Fund will offer one of two potential repayment structures:

i. Amortizing loan; or

ii. Cash flow contingent loan.

B. Guarantees

Unless otherwise determined by the Fund, not including investor/syndicator partners or members of the ownership entity, all underlying individuals, corporate entities, partnerships, or limited liability companies with an interest in the project's ownership entity will be required to provide the following guarantees:

i. Completion Guarantee including provisions guaranteeing construction completion of the project.

ii. Repayment Guarantee including provisions guaranteeing environmental compliance and compliance with HUD HOME guidelines.

iii. Replacement Reserve Guarantee to ensure annual deposits to a Replacement Reserve for the project in an amount consistent with the loan documents and/or covenant running with the land.

Guarantees shall be joint and several and must remain in effect throughout the affordability period.

C. Declaration of Land Use and Restrictive Covenants

Each HOME- and/or HTF-funded project must maintain Land Use and Restrictive Covenants enforcing HOME, HTF, and Fund guidelines, as applicable. The Land Use and Restrictive Covenants will be separately recorded and will remain in place for the Affordability Period even if the HOME and/or HTF loan is prepaid. The following guidelines must be enforced through Land Use and Restrictive Covenants:

i. Owner will be owner in fee simple of the property;

ii. Property is not subject to additional liens or encumbrances that the Fund has not agreed to;

iii. The Fund must approve any transfer of the property, and such approval will be in the Fund's sole discretion;

iv. Provisions to enforce ongoing requirements for project compliance through the HOME and/or HTF Affordability period, including:

- The length of the period of affordability;
- Income and rent restrictions on HOME-assisted and/or HTF-assisted units;
- Property standards to be enforced;
- Marketing and leasing requirements; and
- Recordkeeping and reporting requirements.

D. Written Agreement

HOME

In addition to any financing documents, owners of HOME-financed projects must sign a HOME Written Agreement with the Fund. The HOME Written Agreement will identify requirements for compliance with the HOME regulations and the Fund's Rental Housing Program requirements and will remain in effect in the event of any prepayment of the HOME loan.

HTF

In addition to any financing documents, owners of HTF-financed projects must sign a HTF Written Agreement with the Fund. The HTF Written Agreement will identify requirements for compliance with the HTF regulations and the Fund's Rental Housing Program requirements and will remain in effect in the event of any prepayment of the HTF loan.

6. Underwriting & Subsidy Layering Reviews

A. Project Underwriting

All HOME and/or HTF project applications with up to four (4) total units must submit a market assessment documenting the demand for additional affordable rental housing in the location proposed, the supply of affordable rental housing, and other pertinent information such as the location of employment opportunities, schools, and waiting list data. In addition, the developer must explain the marketing plan and indicate who will be responsible for marketing and leasing the units. Market assessment documents must be less than six (6) months old.

All HOME and/or HTF project applications with five (5) or more total units must include a professionally-prepared market study, and applicants may submit the market study used in conjunction with the applicant's LIHTC application, if applicable. Market studies must be less than six (6) months old. Proposed rent levels must be supported by the applicant's market study and within HOME and/or HTF regulatory limits, as applicable.

All HOME and/or HTF applications must include the three most-recently audited financial statements from all underlying developers, owners, and guarantors and will be subject to the Fund's evaluation of fiscal soundness as required by 24 CFR 92.250(b)(2) and 24 CFR 93.300(b)(2), respectively.

Project Underwriting will also include:

i. Vacancy factor of at least 7% for family developments and at least 5% for elderly developments, unless the market study indicates otherwise.

ii. Fund staff will use a maximum 2% inflation factor for all sources of income.

iii. All operating expenses will be underwritten with an inflation factor of at least 3%.

iv. All HOME and/or HTF projects must maintain a total project Debt Coverage Ratio (DCR) of 1.20-1.25. Properties with a DCR that exceeds 1.25 may have rent increases reduced or denied.

v. Proposals must include justification of operating costs that includes a comparison to similar projects in the local market. Whenever possible, comparable properties should be operated by the proposed management company.

vii. At a minimum, projects must make replacement reserve deposits of $300 per unit per year for family projects and $250 per unit per month for elderly projects, unless otherwise determined by another federal or State agency and Replacement Reserve must be funded and maintained for the full affordability period and reflected in the operating expenses for the full 15-to-40-year projection of expenses, as applicable. Replacement Reserve deposits will be inflated at 3% annually.

viii. For equity pricing that is above the Fund's projections, if applicable, applicants must submit documentation indicating that a syndicator or investor has reviewed the proposal and indicated preliminary pricing along with their interest in the project.

ix. Applicant must provide the amounts and terms for the construction financing, permanent financing, and if applicable, owner equity information.

B. Proforma Requirements

The Fund requires the proforma to explicitly show:

i. An itemized breakdown of units by bedroom size, square footage, income restriction, and both gross and net rent levels (i.e., net rents are those actually charged after adjusting rents for tenant paid utilities);

ii. Operating cost assumptions should be itemized and show costs on both a total development and per unit basis (the Fund requires the format provided in the RFP;

iii. The hard costs of any stand-alone accessory buildings, including leasing offices, community buildings, laundry facilities, free-standing garages or carports, or maintenance buildings should be specifically itemized in the Development Sources and Uses so that the Fund can complete preliminary HOME and/or HTF cost allocation calculations;

iv. For projects using LIHTCs, net tax credit equity projections should be supported by calculations clearly showing anticipated pricing;

v. The 15-30 year (as applicable) operating projection should clearly show inflation assumptions for all revenues and expenses, including increases in replacement reserve funding; and

vi. Costs and fees are to be paid to the Fund as permitted by the HOME and/or HTF program(s). The HOME and/or HTF program(s) allow(s) the Fund to include, as project costs, its internal soft costs specifically attributable to the project. These may include consulting, legal, inspection, and staff costs associated with reviewing, processing, and monitoring award of funds to a project. The Fund will notify Owners of the amounts to include in their Development Sources and Uses for Fund Due Diligence & Legal Costs and annual Tax Credit/HOME/HTF Monitoring Fee.

C. Cost Limitations

All project costs must be reasonable and necessary. The Fund reserves the right to review any line-item cost to ensure that total project costs are not excessive. Additionally, HOME and/or HTF projects will be subject to the following specific cost limitations:

i. The maximum allowable developer fee that can be paid is 10% of total HOME-eligible and/or HTF-eligible development costs.

ii. Maximum allowable builder General Requirements, Overhead, and Profit are 6%/2%/6%, respectively. The builder line item percentages are calculated on the construction contract price which cannot include construction contingency. If the Fund's Inspector approves a Change Order for use of construction contingency, the same percentages for builder line items apply.

iii. Generally, Architectural, including Engineering fees, may not exceed 6% of total project hard costs (excluding builder's line items).

iv. HOME and/or HTF funds will not be used to pay acquisition costs over and above the appraised value using the income approach.

D. Other Public Funding Sources

Owners must disclose all other firm commitments for funding with the initial HOME and/or HTF RFP to the Fund at the time of application and upon receiving any additional commitments of public source funding. The Fund will conduct a subsidy layering review as part of the underwriting process for any project that includes other public subsidies. Using its underwriting criteria, the Fund will assess the project and may require changes to the transaction to ensure that cash flows to the owner/developer are not excessive. Changes may include a reduction in HOME and/or HTF funds awarded, reductions in the rents being charged to tenants, requirements that excess cash is deposited to an operating reserve, or increases in annual payments on the HOME and/or HTF loan.

The Fund will consider adjusting its underwriting in consultation with other funders if applicable to the project. The Fund retains, at its sole discretion, the power to decide whether to accept alternative standards.

7. Construction Process

A. Fund Construction Inspections

The Fund will provide HOME and/or HTF funds in the form of construction and/or permanent financing only. The Fund must be provided with the G-702/703 and supporting documentation and Developer/Owner must provide reasonable notice of any changes to scheduled monthly draw inspections during the construction period. Fund staff will participate in all draw reviews and conduct inspections to ensure that the project is progressing and that work completed is consistent with all applicable HOME and/or HTF requirements.

B. Davis-Bacon

<u>HOME</u>

When Davis-Bacon applies to a project, the Fund must be provided with compliance documentation throughout the construction period even when HOME is provided as a permanent loan following the completion of construction. Prior to commencing construction, the Fund must approve current wage determinations applicable to the project. The contractor will be required to provide weekly payroll forms to the Fund and allow access to the site and workers for the purpose of completing worker interviews.

The Fund will accept Form WH-347 or acceptable internal forms from the contractor. Form WH-347 and instructions for completing it may be accessed at:

http://www.dol.gov/whd/forms/wh347instr.htm.

HTF

Davis-Bacon does not apply to HTF projects.

C. Drawing Funds

The Fund's HOME and/or HTF Loan is intended as construction and/or permanent financing. Proceeds of the HOME and/or HTF loan will only be released as reimbursement for eligible project costs.

A. Conditions of Construction Draws: Proceeds of the HOME and/or HTF loan will only be released to Owner for actually-incurred HOME-eligible and/or HTF-eligible project costs. The obligation of the Fund to approve any draw or to make any disbursement of HOME and/or HTF funds is subject to the satisfaction of the following conditions at the time of making such disbursement.

i. Draws may not be processed if the Owner is in default.

ii. The Project shall not have been materially damaged by fire or other casualty.

iii. The Fund shall have received evidence satisfactory to the Fund that all work and improvements requiring inspection by any governmental authority having jurisdiction have been inspected and approved by such authorities and by any other persons or entities having the right to inspect and approve construction.

iv. Owner shall have submitted at least ten (10) days prior to the date a disbursement is desired a completed disbursement request using AIA G-702 (Contractor's Application for Payment) and G-703 (Continuation) forms and such other appropriate source documentation as may be required by the Fund including, without limitation, the following:

a. Current Contractor Tracking Form and lien waivers, which are to be dated no less than five (5) days precedent to the date of the requested disbursement.
b. Evidence satisfactory to the Fund that the Project and the contemplated use thereof are permitted by and comply with all applicable uses or other restrictions and requirements in prior conveyances, zoning ordinances, or regulations that have been duly approved by the municipal or other governmental authorities having jurisdiction; that the required building permits and other permits have been obtained as required; and that no environmental

impact statement is required or that such environmental impact statement has been properly filed and approved.

c. Appropriate certifications of compliance in all respects with labor standards and prevailing wage requirements applicable under federal law.
d. Such other supporting evidence as may be requested by the Fund or its agent to substantiate all payments which are to be made out of the relevant disbursement and/or to substantiate all payments then made with respect to the Project.
e. The Fund shall have determined that all HOME and/or HTF requirements pertaining to the disbursement of funds have been met, including but not limited to monitoring of Davis-Bacon compliance.
f. The Fund shall have received a current inspection report from a Fund Inspector that verifies satisfactory completion of work to HOME standards.
g. No determination shall have been made by the Fund that the undisbursed amount of the loan is less than the amount received to pay all costs and expenses of any kind that reasonably may be anticipated in connection with the completion of the Project.

B. Conditions of Final Disbursement: In addition to the requirements set forth in Section A, the Fund shall require the following prior to the final disbursement of funds, the request for which shall not be submitted before completion of the Project, including all landscape requirements and offsite utilities and streets and correction of defects in workmanship and/or materials.

i. A certificate of occupancy, if applicable, or a final approved construction report from the Fund's Technical Services Department for the Project.

ii. Identification of the designated street address of the Project, including as applicable the street addresses assigned for the leasing office and each residential structure and the specific unit designations (e.g., unit number or lettering such as #12 or Apartment B-3) for all HOME and/or HTF units.

iii. Evidence satisfactory to the Fund that the Project has been completed lien free and substantially in accordance with the plans and specifications.

iv. Review and final settlement of the cost certification.

v. Such other supporting evidence as may be requested by the Fund or its agent to substantiate all payments which are to be made out of the final disbursement and/or to substantiate all payments then made with respect to the Project.

vi. Lease-up of all HOME-designated and/or HTF-designated units, submission of tenant data necessary to complete the Project in HUD's IDIS system, and the Fund's approval of income determinations for HOME-assisted and/or HTF-assisted tenants.

vii. A determination by the Fund that all HOME and/or HTF requirements pertaining to the initial development of the Project have been met, including but not limited to monitoring of Davis-Bacon compliance, as applicable, and Section 3.

C. Limitation on Draw Requests

i. In all cases, Owner may not request disbursement of HOME and/or HTF funds until funds are needed for the payment of eligible costs, and all disbursement requests must be limited to the amount needed at the time of the request.

ii. No disbursements for materials stored will be made by the Fund unless Owner shall advise the Fund of its intention to store materials prior to their delivery. The propriety of disbursements for materials stored shall be determined in the Fund's sole discretion.

iii. If all or a portion of the developer's fee is not budgeted to be paid with HOME and/or HTF funds, 10% of total HOME and/or HTF funds will be held as retainage until submission and approval of all items in Section B above.

D. Project Closeout

Owners are required to submit demographic data at lease up for all HOME-funded and/or HTF-funded units. Data shall include elderly status, race, gender, female head of household, number of household members, and percent of area median income. In addition, prior approval is required of all Leases and Tenant Income Certifications for all HOME-assisted and/or HTF-assisted units. Owners must be aware that the affordability period does not begin for HOME- funded and/or HTF-funded units until all project costs are processed, all demographic data is verified by Fund staff, and the project is entered as completed in the HUD Integrated Disbursement and Information System (IDIS).

The Fund requires a copy of the final project sources and uses statement and submission of the project cost certification prepared by an independent Certified Public Accountant following completion of construction and payment of all development costs.

8. Long-Term Monitoring

Following project closeout, the Fund will monitor the project for ongoing compliance with HOME and/or HTF requirements, including but not limited to income and rent restrictions, property standards, tenant protections, and marketing and fair housing requirements. In addition to requiring periodic reporting as outlined in Section 4.E. above, the Fund will conduct on-site monitoring visits. The purpose of these visits will include, at minimum, reviews of project records and inspection of the premises including common areas and residential units. In most cases, such reviews will take place annually based on existing HOME requirements at 24 CFR 92.504(d)(1) and existing HTF requirements at 24 CFR 93.404. However, the Fund reserves the right to conduct site visits more or less frequently based on changes to HOME regulations and/or HTF regulations and Fund policy or based on evidence of compliance deficiencies in a prior monitoring visit.

9. General Information

Please contact Cathy Colby (ccolby@wvhdf.com or 304-391-8663) for more information concerning the HOME and HTF Programs.