

1. Introduction

This plan outlines the requirements for the National Housing Trust Fund (NHTF).

2. Summary of Objectives and Outcomes Identified in this Plan

The purpose of this plan is to identify how the state of Wyoming will utilize NHTF funding provided by Housing and Urban Development in 2016. The plan will be administered to provide decent housing and to provide suitable living environments.

Decent Housing Activities

- Increase the availability of permanent and affordable housing through new construction and/or rehabilitation of rental units utilizing NHTF funds available to low-income citizens of Wyoming
- Assist homeless persons in obtaining affordable housing
- Retain the affordable housing stock
- Increase supportive housing, inclusive of structural features and services to enable persons with special needs to live with dignity

Suitable Living Environment Activities

- Improve the safety and livability of neighborhoods
- Increasing access to quality facilities and services
- Reduce the isolation of income groups within areas by de-concentrating housing opportunities and revitalizing deteriorating neighborhoods
- Restore, enhance and preserve natural and physical features of specific historic, architectural or aesthetic value and conserving energy resources

3. Evaluation of Past Performance

The National Housing Trust Fund is a new funding source, thus an evaluation of past performance is not possible.

4. Summary of Citizen Participation Process and Consultation Process PR-15 Citizen Participation CFR 91.115 and 91.300 (c)

WCDA held a public online meeting through GoToMeeting at 1:30 p.m. on Sept. 8, 2015 at the Wyoming Business Council in Cheyenne to solicit public input for the 2016 Annual Action Plan (AAP) which included a short discussion on NHTF. We had seven people participate via phone. No comments regarding the NHTF were received at that time.

Upon receiving notification of our allocation amount, WCDA conducted a second public hearing through GoToMeeting on June 9, 2016 at 10:00 a.m. at the offices of WCDA in Casper. There were four attendees present at the hearing with an additional six attendees present via telecom. A 30 day comment period ensued from June 10, 2016 through July 11, 2016. All comments received are discussed in Section 5 below.

A third public meeting was held on August 4, 2016 at which time the final plan was presented. Of the two attendees, no comments or questions were received.

Notices announcing all meetings were published in several newspapers including the paper with statewide distribution, an e-mail notification went to local government officials, county commissioners, community and economic development offices, non-profits, those persons and agencies on mailing lists for different affordable housing programs, county health offices, family planning units, utility companies, housing authorities, senior facilities, chambers of commerce, Native American Tribal Planning Departments, mental health agencies, agencies dealing with homeless and low-income issues, lending institutions and real estate professionals.

5. Summary of public comments PR-15 Citizen Participation CFR 91.115 and 91.300 (c)

Comments received during the June 9, 2016 public hearing regarding the NHTF consisted of the following:

- 1) Do not allow NHTF proceeds to be used for homeownership because tax, insurance, and maintenance costs could cause undue burdens to low income homeowners.**
 - The state agrees and the NHTF allocation plan does not allow for this.
- 2) Would rental increases differ from other WCDA programs?**
 - The state will handle NHTF rental increases the same as the HOME program.
- 3) Would increases in rental income levels over the 30% qualification mark be handled differently than other WCDA programs?**
 - The state will handle NHTF increased rental income levels as required by the NHTF program.
- 4) Would NHTF be administered by WCDA similar to the HOME program?**
 - The state plans to administer NHTF in a similar fashion to the HOME program.
- 5) Can tax credit, HOME, and NHTF proceeds be piggybacked together?**
 - The state plans to allow all of these funding sources to be utilized together.

- 6) **A concern was voiced that the 30% NHTF units will be the hardest to qualify & keep qualified.**
 - The state agrees and is offering incentives by providing low interest rate financing and deferred and/or forgivable loans.
- 7) **Will grants be available to existing ELI homeowners for repairs?**
 - The state does not plan to grant NHTF proceeds to individual homeowners for repairs.
- 8) **Will NHTF compliance be consistent and comparable to other WCDA programs to help managers comply with regulations?**
 - The state intends to meet the compliance requirements for the NHTF program which are similar to the HOME program.

6. **Summary of comments or views not accepted and the reason for not accepting them. PR-15 Citizen Participation CFR 91.115 and 91.300 (c)**

WCDA received a request to allow grants to existing ELI homeowners for repairs. The state does not plan to grant NHTF proceeds for any homeownership purposes. WCDA will be using 90% of the NHTF proceed on rental housing and 10% will be used for WCDA's administrative and planning costs.

7. **Summary**

The state of Wyoming had ten participants at the June 9, 2016 NHTF public hearing. Eight comments were received, one of which is not incorporated into the NHTF allocation plan (see number six above). The state will continue to take comments throughout the next year and incorporate them into the drafting of the next AAP.

SP-10 Geographic Priorities CFR 91.315(a)(1)

Wyoming has not set specific geographic areas in which assistance will be directed over the coming year. However, as more and more affordable housing units are developed, it is becoming increasingly more important to target these funds to the areas of the greatest need. Applicants for NHTF funds will need to be able to show that there is a demand for the type and price of unit they are proposing. WCDA will be utilizing the Wyoming Housing Data Base Partnership Reports (Semiannual Profiles, Housing Conditions Report & Forecasts) for comparison to the Developers own information. While the WCDA continues to recognize need as the primary driver of housing within any given community and maintains scoring that reflects this principle, a scoring category for geographic distribution is included in the allocation plan. This category will help ensure that affordable housing resources are distributed throughout the state and no one community shall benefit disproportionately to the rest of the state. The WCDA provides a list of funded projects by community on its web-site for its housing programs. The state has no racial or ethnic concentrations, i.e. no racial or ethnic minority which is greater than 10% of the State population. Results from the upcoming Assessment of Fair Housing will be reviewed and incorporated into future NHTF allocation plans.

SP-25 Priority Needs CFR 91.315(a)(2)

The priority needs for the state of Wyoming remain the same even with the addition of NHTF funding and are listed below.

NHTF	
Priority Need Name	State of Wyoming
Priority Level	High
Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

SP-30 Influence of Market Conditions CFR 91.315(b)

The influence of market conditions for the state of Wyoming remain the same even with the addition of NHTF funding and are listed below.

NHTF	
Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	N/A
TBRA for Non-Homeless Special Needs	N/A
New Unit Production	The high cost of construction and the need to build fewer units given Wyoming's sparse population and small communities will be a challenge for producing new units. Subsidies will be very important to entice developers to attempt projects in Wyoming - particularly in some of Wyoming's smaller communities.
Acquisition & Rehabilitation	While housing market conditions are improving, the improvements are slow and make the ability to rehabilitate existing housing more important. Wyoming's Analysis of Impediments to Fair Housing Choice showed an increase in properties that were falling into disrepair (possibly due to the tough economic times) so the market is definitely having an effect which only highlights the need for programs and funding available to rehabilitate existing properties for those unable to change their living situation.

SP-35 Anticipated Resources CFR 91.315(a)(4) and 91.320(c)(1) & (2)
AP-15 Expected Resources CFR 91.320(c)(1) & (2)

NHTF								
Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative
			Annual Allocation \$	Program Income \$	Prior Year Resources \$	Total \$		
NHTF	Public - Federal	Multifamily rental acquisition/ rehab and new construction	\$2,700,000				\$5,400,000	NHTF funding is expected to be utilized with other housing funding sources.
		Admin and planning costs	\$300,000				\$600,000	
Total			\$3,000,000	\$0	\$0	\$3,000,000	\$6,000,000	

SP-45 Goals CFR 91.315(a)(4) and 91.315(b)(2)

NHTF								
Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	NHTF Renters-0-30% of Median Family Income	2016	2017	Affordable Housing		State of Wyoming		Rental units constructed: 10 Household Housing Units

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

NHTF			
Source	Population	Projected Units	Objectives
NHTF	Renters, 0-30% of Median Family Income	10	New construction, acquisition/rehab

AP-25 Allocation Priorities CFR 91.320(d)

1. **Introduction**

Listed below are the agencies allocation priorities for the NHTF

NHTF Allocation Priorities	
Category	Percent of Total Funding
Renters, 0-30% of Median Family Income	90%
Administrative & Planning costs	10%

2. **Reason for Allocation Priorities**

NHTF: Priorities for allocating NHTF funds are followed as set forth in the Wyoming Affordable Housing Allocation Plan. The Plan can be found on WCDA's website: www.wyomingcda.com.

In summary, the highest priority in Wyoming is need, followed by quality of construction, income levels served, affordability and extended length of time the restrictions will be in place. With the highest priority being need, it does not put a preference on new construction or rehabilitation, but rather the priority is on serving the community with the highest need among the applications received.

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

NHTF: In Wyoming our number one priority is the need in a community for affordable housing. WCDA does not believe in allocating funds where they are not needed and where the population will not sustain affordable housing for the long term. Due to the rural nature of the entire state and Wyoming's low population, WCDA has a Small Rural Project Set-aside for a portion of our NHTF allocation to fund housing projects in towns with populations less than 12,000 that are not within 20 miles of another town with a population over 12,000, and the projects must have 24 or fewer units. We have found a need in smaller towns for affordable housing and we have set-aside funds to encourage development where it is most difficult.

AP-30 Methods of Distribution – 91.320(d)&(k)(5)

1. Distribution Methods: NHTF Program

Describe the state program addressed by the Method of Distribution.

NHTF is primarily used as a financing tool for the creation of Affordable Housing Units. Most funding is used in connection with the Low-Income Housing Tax Credit and the HOME Investment Partnership Program.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Projects are awarded based on a scoring criteria listed in detail in the Affordable Housing Plan. Scoring is completed by staff based on information provided by the applicant in their application. The results are presented to the WCDA Board of Directors for final approval.

Certain areas of the state are not pre-identified for NHTF funding, but rather applications addressing the community with the highest need along with other factors are awarded funding. Other major influencing factors include: quality of construction and households being served. WCDA has added to the scoring criteria Extreme Income Targeting which allows for an additional fifteen points under the Income Levels category in order to incent the use of NHTF funds.

Primary Category Criteria Maximum Point Values

- Need, 258
- Quality of Construction, 126
- Income Levels, 40
- Affordability Levels, 36
- Length of Affordability Periods, 35
- Community Revitalization Areas, 5

Secondary Criteria Maximum Point Values

- Location, 50
- Project Characteristics, 81
- Sponsor Characteristics 50
- Public Housing Waiting Lists, 2
- Serving Families with Children, 4
- Financial Support from Local Sources, 35
- Equity in Project, 20
- Management Capacity and Project Costs, can result in negative points

The complete criteria can be found in the Wyoming Affordable Housing Allocation Plan Section V. Initial Allocation Criteria on the WCDA website at:

http://www.wyomingcda.com/documents/2016_FINAL_NHTF_QAP.pdf

Describe how resources will be allocated among funding categories

The WCDA anticipates \$3 million in new NHTF funding, to be distributed as follows: Small Rural Project Set-aside \$700,000; Rental Housing Production and Rehabilitation \$2,000,000; and Administration \$300,000.

Describe threshold factors and grant size limits

Maximum NHTF funds to any one developer may be limited to 60 percent of total funds available. The WCDA has not set monetary allocation limits other than to say that no one developer would receive more than 60 percent of the available funds and that the amount of funds granted per unit must be reasonable and not exceed the HUD maximum.

What are the outcome measures expected as a result of the method of distribution?

Scoring and method of distribution have been established in hopes that the projects which can demonstrate the greatest need, with good quality construction which will serve the tenants for the longest period of time will be awarded this scarce resource.

We have opportunities all around the state. We receive many calls from nonprofits, businesses and communities. We anticipate receiving more requests for grant funds than are available.

WCDA expects to provide quality rental units available to ELI income citizens of Wyoming. Based on funds available we should see 10 new rental units available in the next two years.

AP-50 Geographic Distribution – 91.320(f)

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

NHTF

WCDA does not target assistance to specific geographic areas in the state as NHTF funding is awarded on a competitive basis. Established scoring criteria ensure projects serving areas of greatest need are prioritized higher. Once the program is well established, WCDA will also consider the amount of NHTF funding which an area has previously received in the award process.

2. Rationale for the priorities for allocating investments geographically

NHTF

Due to the small population of the state, approximately 500,000 in total, the WCDA has developed a Small Rural Project Set-aside to encourage geographic distribution of funds. The WCDA looks at the state as a whole and uses need in a community as its priority.

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

1. Introduction

NHTF

WCDA's allocation criteria for distribution of NHTF funds allows nonprofit and for-profit developers to apply for funding and does award extra points for efforts to house the homeless. Even with incentives for producing housing with rents at or below \$200 a month to support homeless households, in past history no projects have taken on the challenge. Thus, WCDA does not anticipate any additional units to be created and set aside just for homeless family utilizing NHTF funding.

NHTF: Households Supported by Beneficiary Type One Year Goals	
Category	Number of Households
Non-Homeless	8
Homeless	2
Special Needs	0
Total	10

NHTF: Households Supported by Support Type One Year Goals	
Category	Number of Households
Production of New Units	10
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	10

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

The goals and actions for reducing and ending homelessness in this section will remain the same even with the addition of NHTF funds.

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

A final Analysis of Impediments was completed in 2011 and WCDA is the lead agency working on the required Assessment of Fair Housing (AFH) for submission in 2017. The results of the AFH will be incorporated into future NHTF allocation plans.

AP-85 Other Actions – 91.320(j)

1. **Introduction**

Wyoming programs funded by HUD are administered by independent state agencies; funds are used and distributed based on the policies of each agency:

WCDA had two funding rounds for allocation of NHTF funds in the year 2016. No applications requesting NHTF funds were received, likely due to the delayed national announcement of the NHTF allocations. WCDA anticipates two funding rounds for allocation in the year 2017. Our goal is to allocate all of our allotted funding to affordable housing by the end of 2017.

2. **Actions planned to address obstacles to meeting underserved needs**

WCDA awards funding to the underserved rural areas of the state. In addition, WCDA awards extra points within the scoring criteria for any development that commits to housing the homeless.

3. **Actions planned to foster and maintain affordable housing**

WCDA's scoring criteria is favorable to developers that want to preserve these units in an effort to preserve projects being considered for removal from the affordable realm.

4. **Actions planned to reduce lead-based paint hazards**

When WCDA funds a NHTF rehab project, the building will be tested for hazards including LBP, asbestos, mold, and radon. All such hazards will be removed or mitigated.

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

The NHTF program will use the income eligibility of 0-30% of family median income, as set forth by HUD. This income band by definition includes poverty level families. Ninety percent of the NHTF proceeds will be allocated to fund rental projects servicing this income band. Providing affordable housing is the first step toward reducing the number of poverty-level families.

6. **Actions planned to develop institutional structure**

WCDA has developed in depth policies and procedures outlining every task performed at the Authority. Specifically in Federal Programs, WCDA has started revising policies to include NHTF funding. WCDA takes full advantage of all HUD trainings (webinars and in person) to make sure that the entire Federal Programs staff is educated on all regulations and changes to regulations.

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

WCDA awards points for proposals that commit to giving preference to individuals and families on the public housing waiting lists.

WCDA has initiated a Disability and Access focus group conversation during the AFH process in order to solicit feedback from public, private, and social service agencies.

The State's Citizen Participation Plan outlines efforts to gather input from the public in determining where resources will be spent.

NHTF Funding Priorities CFR 91.320(k)(5)(i)

1. Will the State distribute NHTF funds through grants to sub grantees?

N/A

2. Will the State distribute HTF funds by selecting applications submitted by eligible recipients?

Yes, please see attached 2016 Wyoming Housing Allocation Plan

3. Will the State distribute HTF funds by selecting application submitted by eligible recipients? If yes, describe all the criteria that will be used to select applications and the relative importance of these criteria. At a minimum, as required in §91.320(k)(5)(i), the selection criteria must include:

Yes, please see attached 2016 Wyoming Housing Allocation Plan

Recipient Application Requirements- § 91.320(k)(5)(ii)

1. Will the State require that all recipient applications contain a description of the eligible activities to be conducted with NHTF funds as required in § 93.200- Eligible activities?

Yes No

2. Will the State require that each eligible recipient certify that housing assisted with NHTF funds will comply with NHTF requirements?

Yes No

Performance Goals and Benchmarks- § 91.320(k)(5)(iii)

SP-45 Goals and AP-20 Annual Goals and Objectives are detailed earlier in the NHTF Allocation Plan.

VI. OTHER REQUIREMENTS

Maximum Per-unit Development Subsidy Amount- § 91.320(k)(5) and § 93.300(a)

- State developed its own maximum per-unit development subsidy limits and the limits are attached.
- State adopted limits used in other federal programs and the limits are attached

Rehabilitation Standards - § 91.320(k)(5)(iv) and § 93.301(b)

- The State will use NHTF funds for the rehabilitation of housing and has attached its rehabilitation standards.
- The State will not use NHTF funds for the rehabilitation of housing.

Resale and/or Recapture Provisions- § 91.320(k)(5)(v) and § 93.304(f)

- The State will use NHTF funds to assist first-time homebuyers and has attached the applicable resale/recapture provisions.
- The State will not use NHTF funds to assist first-time homebuyers.

HTF Affordable Homeownership Limits- § 91.320(k)(5)(vi) and § 93.305

- The State will use homeownership housing and will use the HUD issued limits.
- The State will use NHTF for homeownership housing and has determined its own affordable homeownership limits and the limits are attached.
- The State will not use HTF funds for homeownership housing.

State Limited Beneficiaries or Preferences- § 91.320(k)(5)(vii)

- The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population. The groups listed have also been identified in the action plan.
- The State will not limit beneficiaries and/or give preferences to any segments of the extremely low-income population.

Refinancing of Existing Debt- § 91.320(k)(5)(viii) and § 93.201(b)

- The State will permit the refinancing of existing debt and the conditions under which the State will refinance existing debt are attached.
- The State will not permit the refinancing of existing debt.

VII. GRANTEE CERTIFICATIONS

- Consistency with plan- The jurisdiction must submit a certification that the housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan. Where the HOPWA funds are to be received by a city that is the most populous unit of general local government in an EMSA, it must obtain and keep on

file certifications of consistency from the authorized public officials for each other locality in the EMSA in which housing assistance is provided. HTF must be included in this certification.

VIII.REQUIRED FORMS

In addition to submitting an HTF allocation plan, the State must submit and/or complete the following standard forms for its HTF program.

- Standard form- 424: [Application for Federal Assistance](#) (§ 91.320(a))
- Standard form- 1199 A: [Direct Deposit Sign up Form](#)