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PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY ENHANCEMENT (PRICE) APPLICATION

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY
DEVELOPMENT

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Contents

| | |
|--|----|
| Executive Summary..... | 2 |
| Threshold Requirements and Other Submission Requirements | 5 |
| Need..... | 6 |
| Soundness of Approach | 24 |
| Capacity..... | 36 |
| Match or Leverage | 39 |
| Long-Term Effect..... | 40 |
| Advancing Racial Equity | 41 |
| Affirmative Marketing..... | 45 |
| Affirmatively Furthering Fair Housing..... | 46 |

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Executive Summary

Manufactured housing provides an important source of naturally occurring affordable housing within the Commonwealth of Virginia. Overall, Virginia needs approximately 280,000 affordable homeownership units and 530,000 affordable rental units in order to keep up with demand.^{1 2} One in five homeowners and nearly half of renters statewide are currently experiencing cost-burden, meaning that they pay more than 30 percent of their incomes towards housing costs. Eight percent of homeowners and one in four renters are severely cost-burdened, meaning they pay more than 50 percent of their incomes towards housing costs.^{3 4} Manufactured housing across the state can provide affordable housing units to some of Virginia's most vulnerable residents including extremely low-income households, those on fixed incomes, individuals with disabilities, and the elderly. However, the quality of many manufactured housing units and their surrounding infrastructure is poor, and many are in the path of potential environmental catastrophes.

The Commonwealth in Virginia requests a total of \$25 million to host a statewide, competitive application. The Commonwealth of Virginia's goals for PRICE funding are to support approximately five projects by eligible applicants to stabilize and improve the material conditions of Manufactured Home Communities (MHCs) and their residents by successfully braiding funding sources. As a state grantee, Virginia would be able to direct funds towards smaller organizations and projects that require grants less than \$5 million or do not have the capacity to apply directly for federal funds. The timing of the PRICE Initiative aligns with statewide priorities as Virginia's biennial budget provides \$5 million for resident-controlled cooperatives or nonprofit organizations to purchase mobile home parks. Additionally, Virginia Housing is allocating resources to assist with resident-controlled community capacity building efforts,

¹ These numbers were calculated by aggregating the total number of households that are both low-income (at or below 80% of median income) and housing cost-burdened (paying at least 30% of their income towards housing costs).

² Virginia Department of Housing and Community Development and Virginia Housing. (2022). *HB854 Statewide Housing Study: Current Efforts, Future Needs, New Strategies*. Retrieved May 7, 2024, from <https://dmz1.dhcd.virginia.gov/HB854/pdf/hb854-full-report-print.pdf>

³ U.S. Census Bureau. (2022). Gross Rent as a Percentage of Household Income in the Past 12 Months. *American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25070*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B25070?q=B25070>: Gross Rent as a Percentage of Household Income in the Past 12 Months.

⁴ U.S. Census Bureau. (2022). Mortgage Status by Selected Monthly Owner Costs as a Percentage of Household Income in the Past 12 Months. *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25091*. Retrieved May 7, 2024, from [https://data.census.gov/table/ACSDT5Y2022.B25091?q=selected owner costs as a percentage &g=040XX00US51&y=2022&d=ACS 5-Year Estimates Detailed Tables](https://data.census.gov/table/ACSDT5Y2022.B25091?q=selected%20owner%20costs%20as%20a%20percentage%20of%20household%20income&y=2022&d=ACS%205-Year%20Estimates%20Detailed%20Tables).

creating additional organizations or communities eligible to receive PRICE funding. The Commonwealth of Virginia would be able to responsibly steward these funds to those who need this funding the most while also maximizing additional state and federal resources across the Commonwealth.

At least \$22.5 million of the PRICE funding will be provided as grants and loans to eligible applicants who score the highest in a competitive grant application cycle, as long as scores are above a designated threshold. Up to ten percent of the requested funds would be used for administrative costs at DHCD through grant closeout. Eligible applicants will be units of local government, planning district commissions and other regional entities, nonprofit organizations, and resident controlled manufactured home communities or cooperatives. The competition will be divided into two years of application cycles, with \$11,250,000 offered each year. Any unallocated funds will roll over to the second year, potentially increasing the total available amount in the second cycle. Each applicant will be eligible for up to \$5,000,000 in hard costs, with an additional \$100,000 available for local administration and compliance expenses. Applicants will be required to show that their projects will meet one of the Community Development Block Grant (CDBG) National Objectives and that they will be able to maintain a minimum of fifteen years of affordability of manufactured housing units, with preference given to projects which demonstrate a mechanism for longer affordability timelines.

Virginia will prioritize projects that (1) repair, revitalize, or replace existing affordable manufactured home units; (2) develop new affordable manufactured housing units and MHCs; (3) provide necessary infrastructure to MHCs, especially sewer and water infrastructure; and (4) improve the resilience of communities and mitigate environmental hazards. The chart below provides a rough outline of Virginia's potential scoring matrix, with special considerations noted in the right column. If awarded funds, Virginia will work with stakeholders to hold a more robust input process in order to develop its program guidelines and scoring matrix.

Table 1: Proposed Scoring Matrix and Special Considerations

| Category | Special Considerations |
|----------------------|---|
| Need (30 points) | <ul style="list-style-type: none">• Data on housing affordability generally and manufactured housing need• Locality Distress Criteria• Community Disaster Resilience Zones |
| Approach (30 points) | <ul style="list-style-type: none">• Mechanisms for ensuring at least 15 years of affordability• Addressing environmental and climate risks• Opportunities for home and land ownership and/or resident-controlled cooperatives• Accessibility |
| Capacity (30 points) | <ul style="list-style-type: none">• Experience managing other grants• Experience with manufactured housing |
| Leverage (10 points) | <ul style="list-style-type: none">• Private or local leverage• Braiding with other DHCD funds |

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Threshold Requirements and Other Submission Requirements

The Commonwealth of Virginia Department of Housing and Community Development has no outstanding or unresolved civil rights matters.

As a state grantee, Virginia is an eligible applicant for PRICE, and we are not applying in conjunction with any other organizations or jurisdictions, so partnership documentation is not necessary. However, other organizations who are applying for PRICE in Virginia have offered their support to DHCD's application. Additionally, the housing finance agency for the state has contributed a letter of support and intends to provide capacity building funds to resident-controlled cooperatives that buy and manage mobile home parks.

This application is the only application submitted by Virginia DHCD, and it is for the PRICE Main grant. DHCD will not provide grants from PRICE funds to any organization or project within its jurisdiction that receives PRICE funds through a separate application.

Virginia DHCD is in compliance with all administrative, national, and departmental policy requirements and terms relevant to this application.

Need

What is your project area and the need for affordable accessible housing within it?

Housing Affordability in Virginia

Virginia Department of Housing and Community Development (DHCD) plans to facilitate a statewide competitive application process, so the project area will encompass the entire state of Virginia. Using the same methodology that the Commonwealth used in a 2022 report entitled HB854 Statewide Housing Study, the state now needs approximately 280,000 affordable homeownership units and 530,000 affordable rental units in order to keep up with demand.^{5 6} One in five homeowners and nearly half of renters statewide are currently experiencing cost-burden, meaning that they pay more than 30 percent of their incomes towards housing costs. Eight percent of homeowners and one in four renters are severely cost-burdened, meaning they pay more than 50 percent of their incomes towards housing costs.^{7 8}

⁵ These numbers were calculated by aggregating the total number of households that are both low-income (at or below 80% of median income) and housing cost-burdened (paying at least 30% of their income towards housing costs).

⁶ Virginia Department of Housing and Community Development and Virginia Housing. (2022). *HB854 Statewide Housing Study: Current Efforts, Future Needs, New Strategies*. Retrieved May 7, 2024, from <https://dmz1.dhcd.virginia.gov/HB854/pdf/hb854-full-report-print.pdf>

⁷ U.S. Census Bureau. (2022). Gross Rent as a Percentage of Household Income in the Past 12 Months. *American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25070*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B25070?q=B25070>: Gross Rent as a Percentage of Household Income in the Past 12 Months.

⁸ U.S. Census Bureau. (2022). Mortgage Status by Selected Monthly Owner Costs as a Percentage of Household Income in the Past 12 Months. *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25091*. Retrieved May 7, 2024, from [https://data.census.gov/table/ACSDT5Y2022.B25091?q=selected owner costs as a percentage &g=040XX00US51&y=2022&d=ACS 5-Year Estimates Detailed Tables](https://data.census.gov/table/ACSDT5Y2022.B25091?q=selected%20owner%20costs%20as%20a%20percentage%20of%20household%20income).

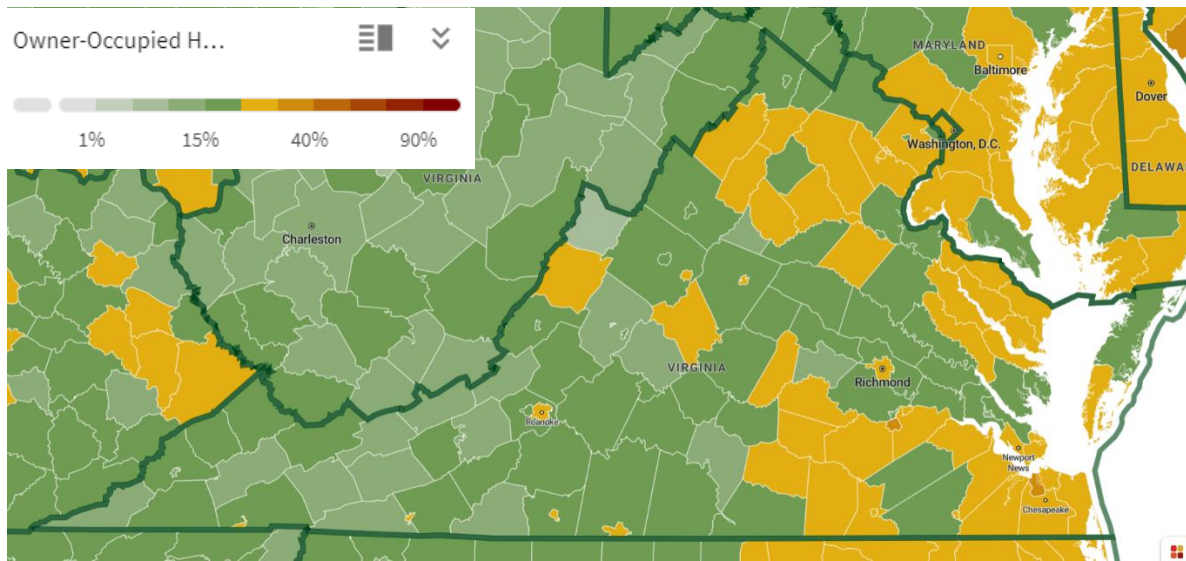


Figure 1: Social Explorer. (2022). Mortgage Status by Selected Monthly Owner Costs as a Percentage of Household Income in the Past 12 Months. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25091. United States Census Bureau.

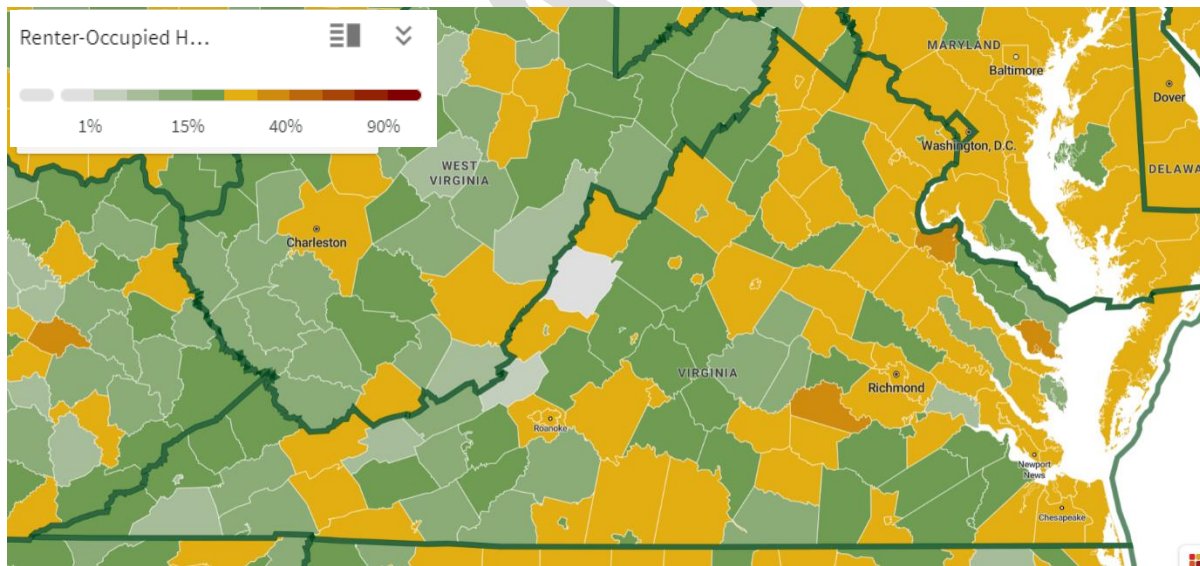


Figure 2: Social Explorer. (2022). Gross Rent as a Percentage of Household Income in the Past 12 Months. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25070. United States Census Bureau.

As of March 2024, the median home sale price for the state of Virginia was \$397,000, up 7.3 percent from a year ago at the same time.⁹ Statewide median rent for a two-bedroom unit is currently approximately \$1,700 per month.¹⁰ ¹¹ In order for that rent to be affordable to a minimum wage worker in Virginia, they would have to work 109 hours a week every week of the year.¹²

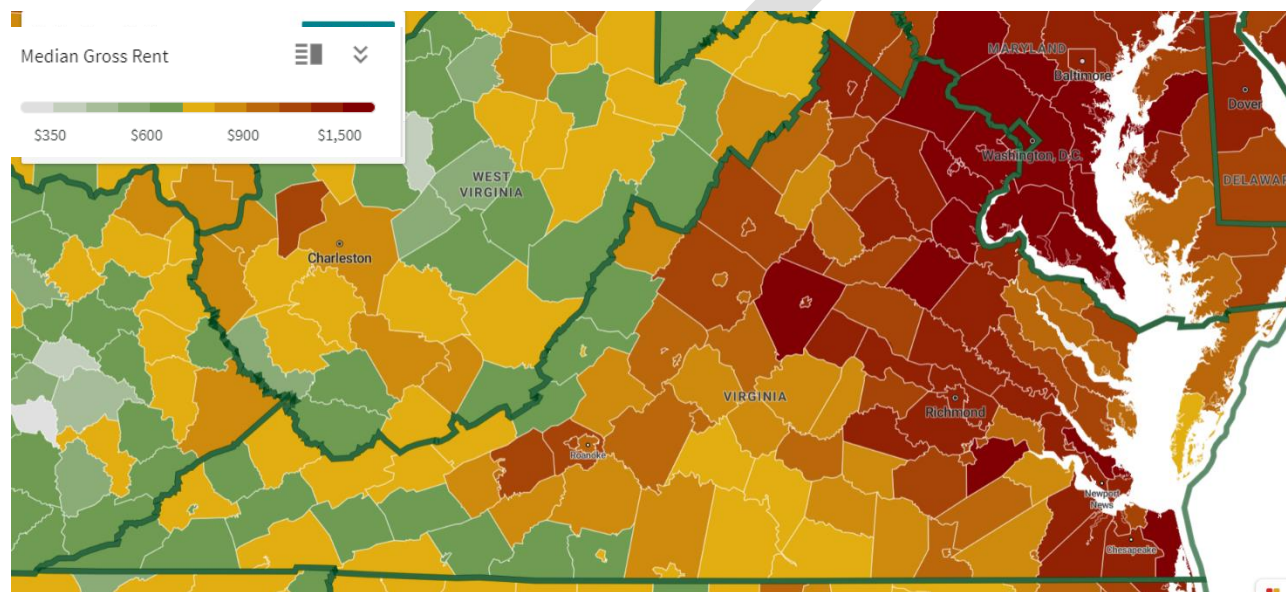


Figure 3: Social Explorer. (2022). Median Gross Rent. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25064. United States Census Bureau.

Statewide, residents experience a wide range of circumstances in the housing market. In some localities, household incomes are high enough and home prices and rents are low enough that most households can afford housing. However, in some localities like Richmond, Portsmouth, and Manassas, more than 50 percent of renters are cost burdened.¹³ Some counties have median rents much higher than what the average resident could afford. For example, in the city of Waynesburg where the median rent for a two-

⁹ Virginia Realtors. (2024). *Virginia Home Sales Report March 2024*. Retrieved May 7, 2024, from <https://virginiarealtors.org/research/reports/home-sales-reports/march-2024-home-sales-report/>

¹⁰ CoreLogic. (2024). State of Virginia Rent Median for Two Bedroom Units in 2024. *Real Estate Analytics Suite RentalTrends*.

¹¹ CoStar. (2024). Multi-Family Property Analytics for Virginia 2024 Q1. *CoStar Suite*.

¹² National Low Income Housing Coalition. (2024). Out of Reach Report 2023: Virginia. Out of Reach. Retrieved May 7, 2024, from <https://nlihc.org/oor/state/va>

¹³ U.S. Census Bureau. (2022). Gross Rent as a Percentage of Household Income in the Past 12 Months. *American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25070*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B25070?q=B25070:GrossRentasPercentageofHouseholdIncomeinthePast12Months>.

bedroom unit is \$1,400, the median household can only afford about \$700 a month.¹⁴ In parts of northern Virginia, the median sales price of a two-bedroom home is near \$700,000 making it difficult for all but the wealthiest residents of Virginia to purchase housing.¹⁵

Manufactured Housing in Virginia

Data about manufactured housing is rarely collected and is minimally available. In 2017 and 2021, Virginia was one of the states for which the United States Census Bureau provided state-level estimates for data collected in the American Housing Survey (AHS) using a combination of data from the national file and the metro sample.¹⁶ Even within these publications, many of the data points regarding manufactured housing were not published due to a failure to meet publication standards or in an effort to prevent disclosure of personally identifiable information. However, the data that is available shows the importance and unique affordability of manufactured housing in Virginia for some of the state's most vulnerable residents, as well as some serious problems with housing quality, infrastructure and resilience. With the PRICE grant, Virginia hopes to help address issues of quality, accessibility, and exposure to environmental hazards for underserved populations including very-low-income households, the elderly, and Hispanic or Latino families, all of which are disproportionately represented in manufactured housing. There is a great opportunity in manufactured housing to reinforce and expand affordable housing options, while redressing some of the major problems with existing stock and ensuring long-term affordability and wealth-building opportunities.

Manufactured housing is a meaningful part of Virginia's housing stock and, in particular, its naturally occurring affordable housing (NOAH) stock. Based on AHS estimates, there are 133,300 total mobile or manufactured units in Virginia, about 30,000 of which are presently vacant.¹⁷ A 2016 study of mobile and manufactured housing in Appalachia, which included 25 counties and eight independent cities in Virginia's southwest region, found that 15 percent of that region's housing stock is made up of mobile

¹⁴ CoreLogic. (2024). State of Virginia Rent Median for Two Bedroom Units in 2024. *Real Estate Analytics Suite RentalTrends*.

¹⁵ CoreLogic. (2024). State of Virginia Median Sales Price in 2024. *Real Estate Analytics Suite MarketTrends*.

¹⁶ United States Census Bureau. (2023). *American Housing Survey 2021 Technical Documentation, Appendix A: Subject Definitions and Table Index*. Retrieved May 7, 2024 from <https://www2.census.gov/programs-surveys/ahs/2021/2021%20AHS%20Definitions.pdf>

¹⁷ United States Census Bureau. (2018). *2017 American Housing Survey State*. Retrieved May 7, 2024, from https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2021&s_tablename=TABLE1&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

and manufactured homes.¹⁸ In the Richmond metropolitan statistical area, which is home to 54 mobile home parks, manufactured homes only make up about 3 percent of the housing stock, but in the more rural counties on the outskirts of the region, manufactured housing makes up more than 20 percent of the stock.¹⁹ Most of these units are not in large “parks”; almost 75 percent of units are either individual units on privately owned lots or in groups of 6 or less. Only about 16 percent of units are in large parks of 21 or more units.²⁰ A map showing the percentage of housing stock that is made up of mobile homes is provided below.

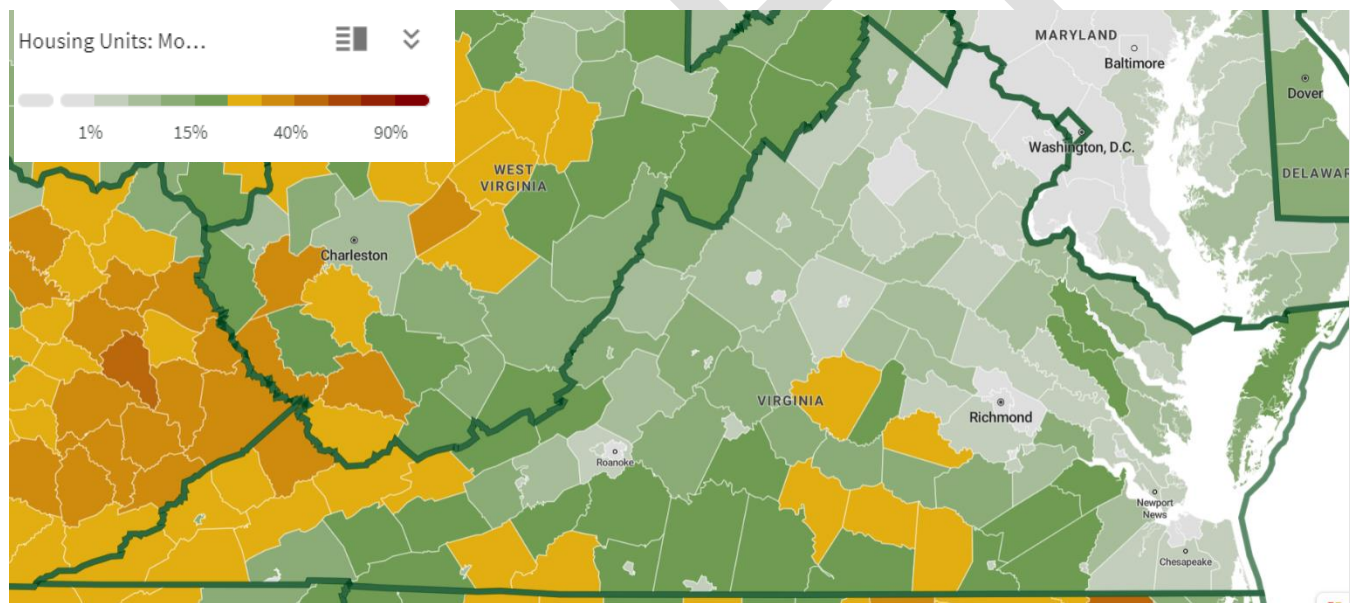


Figure 4: Social Explorer. (2022). Structure Type by Occupancy Status—Mobile Homes. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25136. United States Census Bureau.

¹⁸ Jones, M., Koebel, T., McCoy, A., Shanholtz, S., & Moeller, J. (2016). *Mobile and Manufactured Homes in Central Appalachia and Alabama: Age, Condition, and Need for Replacement*. Virginia Center for Housing Research at Virginia Tech. Retrieved May 7, 2024, from <https://vtechworks.lib.vt.edu/server/api/core/bitstreams/068d230d-21a5-4519-88a6-81f54b65f958/content>

¹⁹ Brown, J. and Knopf, J. (2016). *An Assessment of Central Virginia’s Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities*. HDAdvisors. Retrieved May 7, 2024, from https://mhccv.org/wp-content/uploads/2017/08/mhccv_centralva_report.pdf

²⁰ United States Census Bureau. (2022). *2021 American Housing Survey State*. Retrieved May 7, 2024, from https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2021&s_tablename=TABLE1&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

Household incomes of those who live in mobile or manufactured homes are extremely low. The median household income of a manufactured housing household is \$22,000 per year, about 25 percent of the median household income for all households in Virginia. However, manufactured housing may provide an affordable housing source for even some of the lowest-income Virginia households. Median housing costs for households in manufactured units are about \$546 per month, and households spend, on average, about 22 percent of their income on housing, a ratio that is considered to be affordable. About 31 percent of manufactured housing residents are renters, and the median rent of a manufactured unit is \$400 per month. For those who own their units but not the lots on which they sit, the median lot rent is about \$320, and those who have debt on their units pay about \$400 per month on average towards their mortgage or personal property loan. About 44 percent of all manufactured home residents own the unit outright, while 21 percent own their units with a mortgage or other form of debt. Residents of manufactured homes also typically pay about \$170 monthly for utilities and \$200 for regular maintenance. Depending on the financing structure of the unit, owners may also pay property taxes or insurance.²¹

Despite the benefits of affordability, there are ongoing issues with manufactured housing including barriers to wealth-building, housing quality, and resilience to climate and environmental hazards. It is difficult for owners of manufactured homes to build wealth. In 2021, the median value of a mobile or manufactured home was only \$62,800 according to the American Community Survey.²² Estimates of actual asking prices for mobile homes vary greatly, but the median asking price provided by the AHS in 2021 is only \$15,000.²³ This is lower than the estimate provided in 2017 of \$30,000 and may show that manufactured housing is not providing valuable equity for owners. In Southwest Virginia, the value of the housing ranges significantly with its age. Units built before 1970 are worth about \$15,000 on average, while those built after 2010 were worth about \$80,000.²⁴ Many manufactured homes are

²¹ Ibid.

²² U.S. Census Bureau. (2022). Median Value (Dollars) for Mobile Homes. *American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25083*. Retrieved May 7, 2024, from [https://data.census.gov/table/ACSDT1Y2022.B25083?q=Manufactured/Mobile Homes&g=040XX00US51](https://data.census.gov/table/ACSDT1Y2022.B25083?q=Manufactured/Mobile%20Homes&g=040XX00US51).

²³ United States Census Bureau. (2022). *2021 American Housing Survey State*. Retrieved May 7, 2024, from https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2021&s_tablename=TABLE1&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

²⁴ Jones, M., Koebel, T., McCoy, A., Shanholtz, S., & Moeller, J. (2016). *Mobile and Manufactured Homes in Central Appalachia and Alabama: Age, Condition, and Need for Replacement*. Virginia Center for Housing Research at Virginia Tech. Retrieved May 7, 2024, from <https://vtechworks.lib.vt.edu/server/api/core/bitstreams/068d230d-21a5-4519-88a6-81f54b65f958/content>

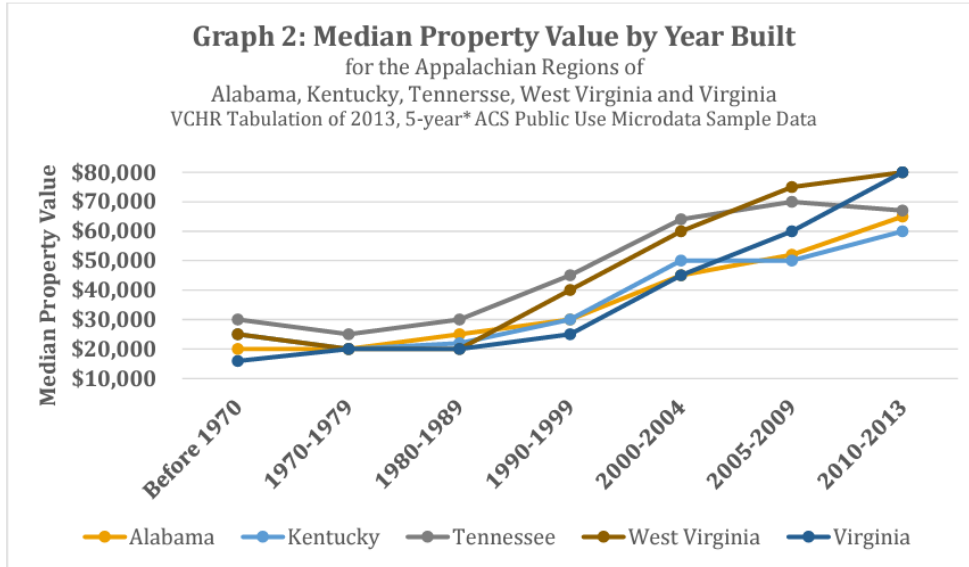
financed through personal property loans instead of home mortgages, which are accompanied by higher interest rates. Additionally, personal property like vehicles, depreciates over time while “real property”, meaning real estate, tends to appreciate.²⁵ This means that owners of manufactured housing are not necessarily gaining equity the way that traditional homeowners do and are often paying more in interest than they would in a traditional stick-built home. However, ownership of newer manufactured homes that are converted to real property can be a meaningful source of home equity and wealth building opportunities for families.

The affordability of manufactured housing units is also often accompanied by poor quality. The manufactured housing stock in Virginia is quite old with the median manufactured housing unit in Virginia constructed in 1986.²⁶ In the southwest Virginia region, 21 percent of manufactured units were constructed prior to 1976, the year in which HUD instituted building safety standards for manufactured housing.²⁷

²⁵ Brown, J. and Knopf, J. (2016). *An Assessment of Central Virginia’s Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities*. HDAvisors. Retrieved May 7, 2024, from https://mhccv.org/wp-content/uploads/2017/08/mhccv_centralva_report.pdf

²⁶ United States Census Bureau. (2022). *2021 American Housing Survey State*. Retrieved May 7, 2024, from https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2021&s_tablename=TABLE1&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

²⁷ Jones, M., Koebel, T., McCoy, A., Shanholtz, S., & Moeller, J. (2016). *Mobile and Manufactured Homes in Central Appalachia and Alabama: Age, Condition, and Need for Replacement*. Virginia Center for Housing Research at Virginia Tech. Retrieved May 7, 2024, from <https://vtechworks.lib.vt.edu/server/api/core/bitstreams/068d230d-21a5-4519-88a6-81f54b65f958/content>



* The data displayed is a tabulation of ACS 2013, 5-year data. The 5-year data can be thought of as a five-year average that shows longer term trends. Five-year data is less reflective of market fluctuations and other temporary disturbances. Nonetheless, 1-year data can still be informative. Charts with 1-year data can be found in Appendix 3.

Figure 5: Jones, M., Koebel, T., McCoy, A., Shanholtz, S., & Moeller, J. (2016). *Mobile and Manufactured Homes in Central Appalachia and Alabama: Age, Condition, and Need for Replacement*. Virginia Center for Housing Research at Virginia Tech.

The quality of mobile and manufactured homes, particularly older homes, is an ongoing issue across the state. In 2017, 21 percent of manufactured housing residents reported being uncomfortably cold in their homes for 24 hours or more at a time. More than 25,000 households experienced a water leak coming into the unit from the outside, and almost 14,000 experienced water leaks coming from indoor sources like broken pipes or water heaters. About 11,000 units are considered to lack complete kitchens, meaning they lack a kitchen sink, stove or oven, or refrigerator.²⁸ In the southwest region, 701 units were found to have one or more of five “red flags”—no sink, no toilet, no hot and cold running water, no bath or shower, or no stove or range.²⁹ In the Central Virginia region, 26 percent of manufactured home parks are “obsolete”, meaning they have severe, long-standing deficiencies in infrastructure,

²⁸ United States Census Bureau. (2018). *2017 American Housing Survey State*. Retrieved May 7, 2024, from https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2021&s_tablename=TABLE1&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

²⁹ Jones, M., Koebel, T., McCoy, A., Shanholtz, S., & Moeller, J. (2016). *Mobile and Manufactured Homes in Central Appalachia and Alabama: Age, Condition, and Need for Replacement*. Virginia Center for Housing Research at Virginia Tech. Retrieved May 7, 2024, from <https://vtechworks.lib.vt.edu/server/api/core/bitstreams/068d230d-21a5-4519-88a6-81f54b65f958/content>

housing condition, private property, tenure, amenities, and management.³⁰ The units are not always secured on solid foundations, and the areas often lack infrastructure. About 57 percent of units are on concrete blocks instead of a concrete pad or masonry foundation, and 16 percent of units are not anchored. About 46 percent of households have septic or cesspool systems instead of public sewer systems.³¹ As a general rule, units within larger manufactured home parks in Central Virginia tended to be of higher quality than units in smaller home parks, like due to more professional management.

GRAPH 3G: Park Size in Relation to Park Quality (By Typology)

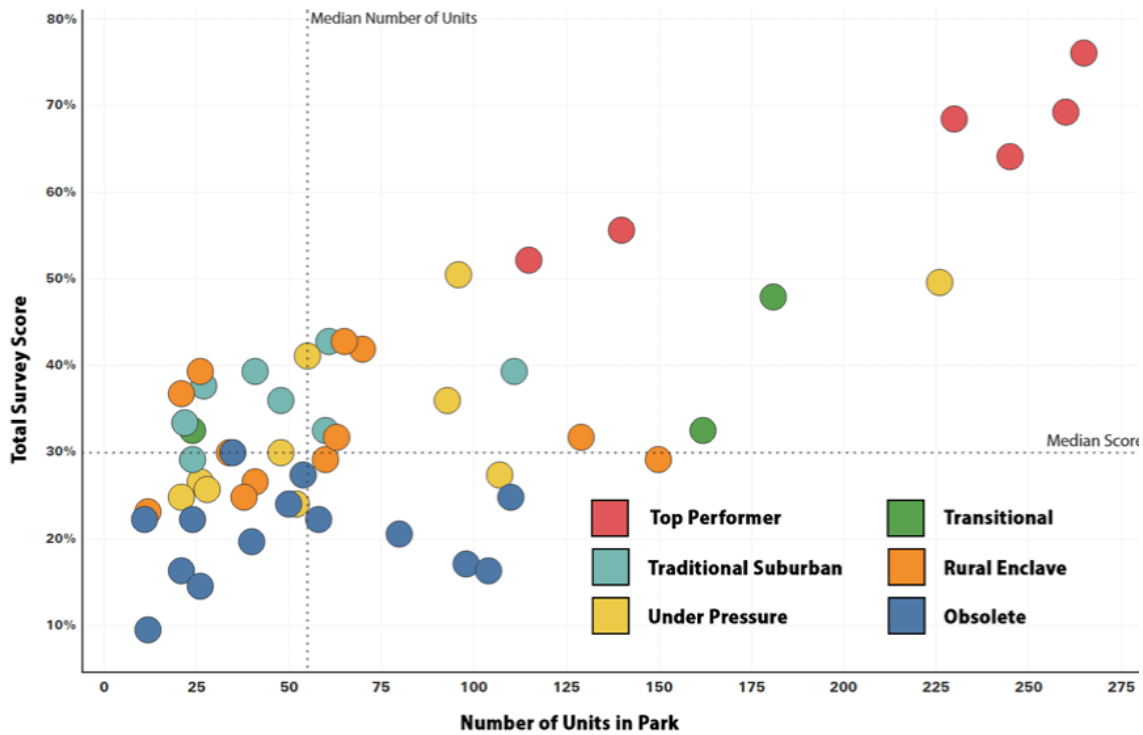


Figure 6: Brown, J. and Knopf, J. (2016). *An Assessment of Central Virginia’s Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities*. HDAAdvisors.

³⁰ Brown, J. and Knopf, J. (2016). *An Assessment of Central Virginia’s Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities*. HDAAdvisors. Retrieved May 7, 2024, from https://mhccv.org/wp-content/uploads/2017/08/mhccv_centralva_report.pdf

³¹ United States Census Bureau. (2022). *2021 American Housing Survey State*. Retrieved May 7, 2024, from https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2021&s_tablename=TABLE1&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

Those who live in manufactured housing are particularly vulnerable populations, with a large percentage of households containing older residents. The median age of those in manufactured housing units in Virginia is 59, with more than 27 percent of units containing someone who is over the age of 65. About 40 percent are multigenerational households, and 26 percent contain children under 18. Not only are manufactured housing residents more likely to be low-income; they are also more likely to have fixed incomes, with about 45 percent considering social security or retirement to be their primary source of income. Eighty one percent are eligible for food stamps.³² Residents of manufactured housing are racially and ethnically diverse. In particular, they are disproportionately Latino in Virginia. While people of Hispanic and Latino origin only make up about 5 percent of Virginia’s overall population, they make up 12 percent of manufactured housing residents.³³ While the large majority of residents have a high school diploma, very few have a bachelor’s degree or higher. In a study of Central Virginia in 2016, researchers found that a total of 30 percent of manufactured housing residents had either physical or mental disabilities.³⁴ Unfortunately, more recent or geographically comprehensive data on disabilities was unavailable.

³² Ibid.

³³ Brown, J. and Knopf, J. (2016). *An Assessment of Central Virginia’s Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities*. HDAvisors. Retrieved May 7, 2024, from https://mhccv.org/wp-content/uploads/2017/08/mhccv_centralva_report.pdf

³⁴ Ibid.

TABLE 2B: Population living in MH vs Region by Ethnicity

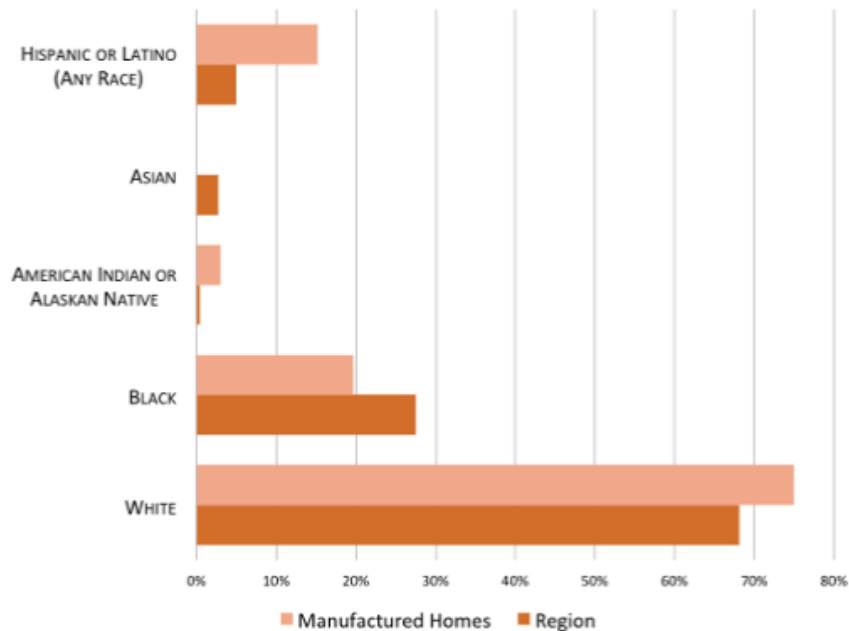


Figure 7: Brown, J. and Knopf, J. (2016). *An Assessment of Central Virginia's Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities*. HDAdvisors.

Is your project within or does it include any communities that meet Distress Criteria? Sixteen localities in Virginia have more than 20 percent of the population living in poverty. Those localities are: the cities of Radford, Norton, Harrisonburg, Danville, Martinsville, Charlottesville, Galax, Petersburg, Buena Vista, and Hopewell and the counties of Lee, Buchanan, Montgomery, Bath, Dickenson, and Charlotte.³⁵

Several localities also meet the second criteria of having an unemployment rate of at least 1.5 times the national employment rate, which is currently 3.9 percent, so a locality with an unemployment rate of at least 5.85 percent would qualify. In addition to several of the cities previously listed for the percent living in poverty, the following cities would qualify on the basis of their unemployment rate: the cities of Colonial Heights, Emporia, Falls Church, Hampton, Norfolk, Portsmouth, Richmond, Roanoke, Suffolk,

³⁵ U.S. Census Bureau. (2022). Poverty Status in the Past 12 Months. *American Community Survey, ACS 1-Year Estimates Subject Tables, Table S1701*. Retrieved May 7, 2024, from [https://data.census.gov/table/ACSST1Y2022.S1701?q=S1701:Poverty Status in the Past 12 Months&g=040XX00US51](https://data.census.gov/table/ACSST1Y2022.S1701?q=S1701:Poverty%20Status%20in%20the%20Past%2012%20Months&g=040XX00US51).

and Williamsburg, and the counties of Essex, Greensville, Highland, Lancaster, Louisa, Mathews, Nottoway, Prince George, Rappahannock, Russell, Surry, Westmoreland, and Wise.³⁶

A map of localities that qualify under the distress criteria in 1(2 CFR 1805.201(b)(3)(ii)(D) can be found below. Virginia DHCD will consider whether a locality meets the distress criteria as a part of its application scoring.

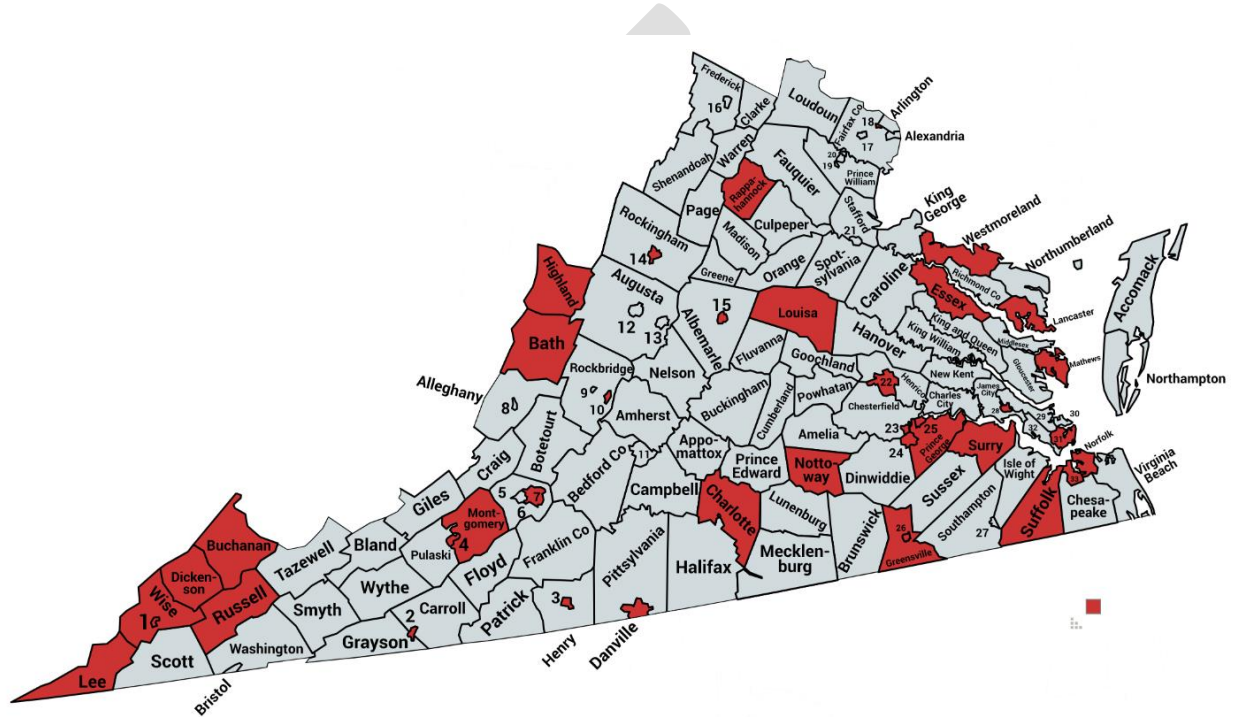


Figure 8: Localities that Meet Distress Criteria in 1(2 CFR 1805.201(b)(3)(ii)(D). Created by authors.

Does your proposal increase resilience in any disaster-prone areas?
Virginia contains the following Community Disaster Resilience Zones:

- Three tracts in Accomack County;
- Two tracts in Northampton County;
- One tract in Northumberland County;
- One tract in Richmond County;

³⁶ U.S. Census Bureau. (2022). Selected Economic Characteristics. *American Community Survey, ACS 1-Year Estimates Data Profiles, Table DP03*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDP1Y2022.DP03?q=Employment and Labor Force Status&g=040XX00US1>.

- One tract in Essex County;
- One tract in Middlesex County;
- One tract in York County;
- One tract in the city of Newport News;
- One tract in the city of Hampton;
- One tract in the city of Norfolk.³⁷

A map can be found below. These communities were identified as having a composite National Risk Index score that ranks in the top 50 nationally or in the top 1 percent within the state of Virginia. Additionally, they are considered to be disadvantaged communities based on the Climate and Economic Justice Screening Tool. Virginia will consider whether a community is within a Community Disaster Resilience Zone as a part of its application scoring.

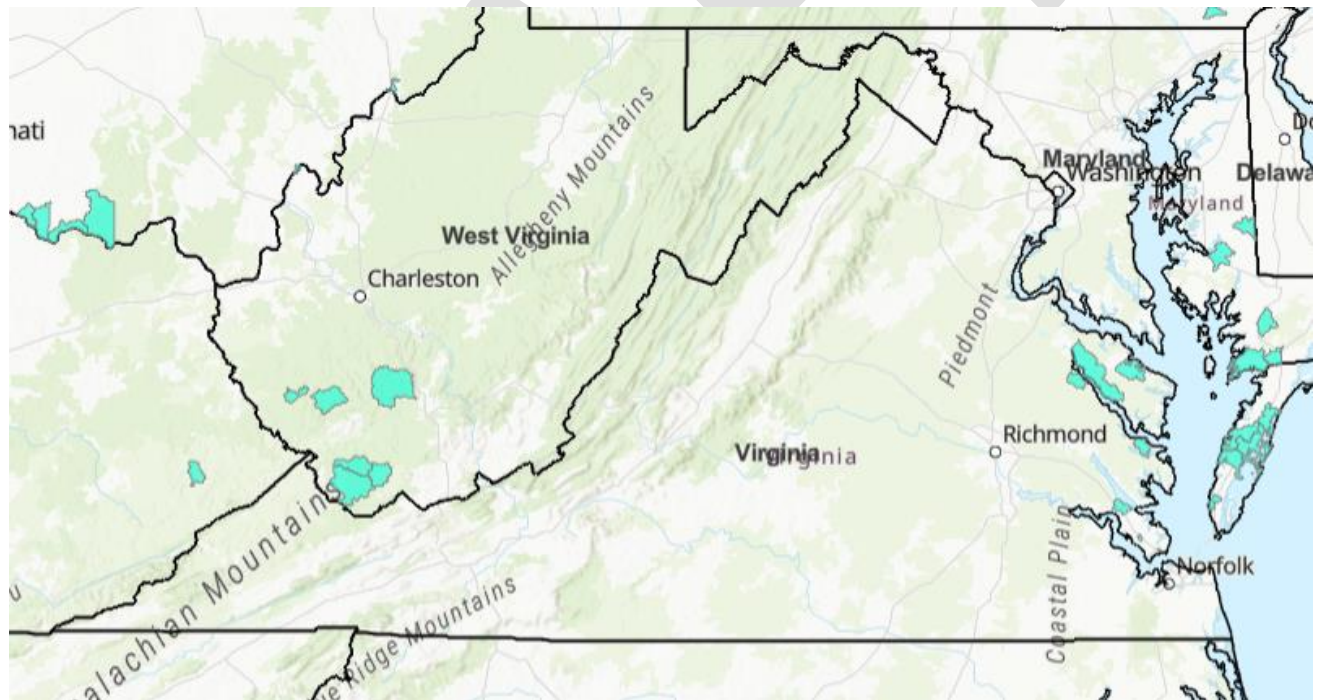
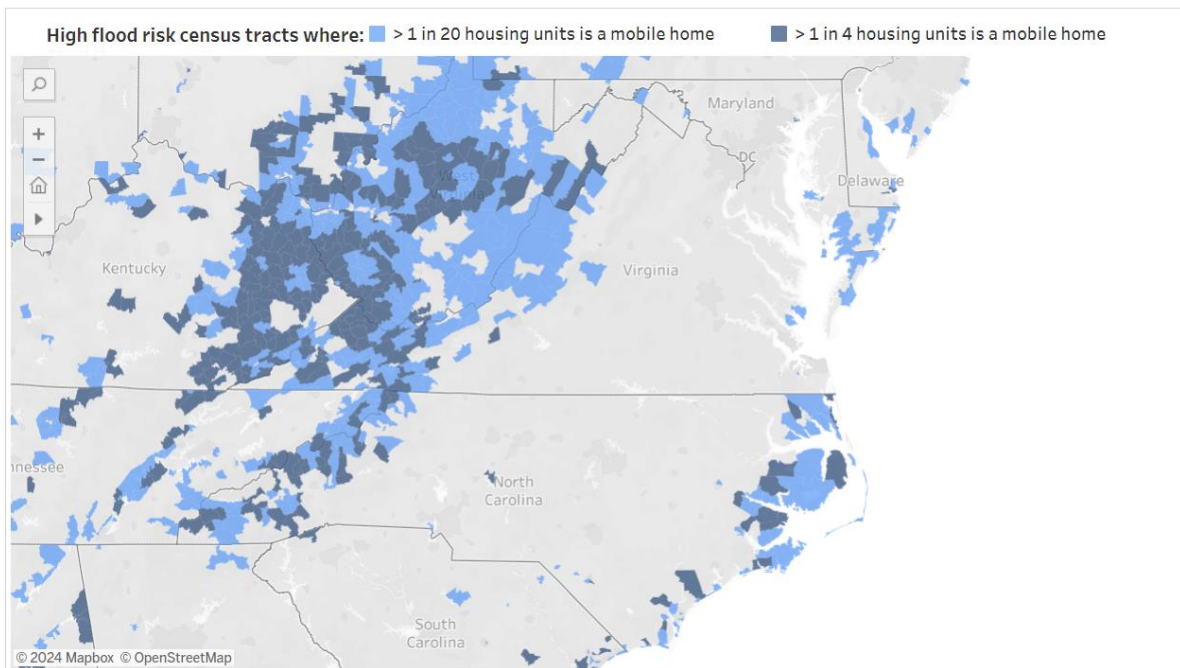


Figure 9: Federal Emergency Management Agency. (2024). Community Disaster Resilience Zones. Community Disaster Resilience Zone Viewer.

³⁷ Federal Emergency Management Agency. (2024). Community Disaster Resilience Zone Viewer. Retrieved May 7, 2024, from <https://experience.arcgis.com/experience/e3bb8cb79d124a0ca38a05e48afb6fd6/page/Community-Disaster-Resilience-Zone-Viewer/>

Beyond just census tracts that are classified under FEMA’s Community Disaster Resilience Zones as being “disaster-prone”, several other areas are prone to flood-related disasters. Using the First Street Foundation’s Flood Factor³⁸ data, the map below shows areas that have both a high flood risk and a high proportion of mobile home units. While FEMA’s maps primarily focus on coastal flooding, the Flood Factor data also accounts for the risks of flash floods which are becoming more common and more destructive, particularly in the mountainous areas of the state. Parts of Southwest Virginia and the Shenandoah Valley are at particular risk for this kind of flooding and are also some of the areas of the state with the largest numbers of manufactured homes.

Mobile homes in areas of high flood risk



Data Sources: First Street Foundation; U.S. Census Bureau.



Figure 10: Smith, K. (2022). Mobile home residents face higher flood risk. Headwaters Economics.

What are the barriers to manufactured housing preservation or revitalization in your project area?

Virginia is working to address barriers that may prevent the preservation or revitalization of manufactured housing across the state. Regulatory barriers in the zoning and permitting process in

³⁸ First Street Foundation. (2023). *First Street Foundation Flood Model (FSF-FM) Technical Methodology Documentation Version 3.0*. Retrieved May 8, 2024 from https://assets.firststreet.org/media/FSF_Flood_Methodology_2023July.pdf

some local communities may produce obstacles for the use of manufactured housing as a tool to expand affordable housing options. Virginia requires manufactured homes to be permitted by-right in agricultural, horticultural, or forestry zoning districts on owner-occupied property, but otherwise does not regulate the zoning of manufactured home communities. Local jurisdictions have the ability to make decisions regarding the zoning and permitting of mobile home communities. In 2021, Virginia passed a law requiring localities to include within their Comprehensive Plans strategies to promote manufactured housing as a source of affordable housing. Strategies localities may use include the preservation of existing MHCs and the creation of new MHCs. Virginia expects that this code will reduce some of the regulatory barriers that localities have erected to prevent manufactured housing within their jurisdictions.

Local opposition to manufactured home parks may contribute to localities' decisions about permitting and zoning. A 2000 study in Virginia found that non-residents of manufactured homes perceive those who live in single-section manufactured homes to be low-income and uneducated.³⁹ About 40 percent of respondents to the survey strongly opposed the siting of single-section manufactured homes in their communities. While perceptions of manufactured homes have surely shifted over the last quarter century due to better quality housing and promotion of manufactured housing as an affordable option, there is likely to be at least some opposition to any manufactured home community. When public hearings are a required step in the zoning and permitting process, that opposition can easily become the loudest voice in the room. Residents of manufactured housing communities and those who would wish to purchase or rent manufactured homes are often made up of the lowest-income and most marginalized groups within a community, so it can be difficult to organize them to speak in favor of manufactured housing. However, several organizations across Virginia have recently been working to organize manufactured home residents, like the Legal Aid Justice Center, New Virginia Majority, The Manufactured Home Community Coalition of Virginia, and the Virginia Poverty Law Center have worked with tenants and owners, and they have developed networks of individuals who support the construction, rehabilitation, and preservation of manufactured home communities. Virginia Housing, the statewide housing finance agency in Virginia, is preparing funding to assist with the capacity building efforts for these potential resident-controlled communities or organizations (See letter of support).

³⁹ Beamish, J.O. & Goss, R. C. (2000). Perceptions of Manufactured Housing in Virginia. *Virginia Agricultural Experiment Station*, 00-1. Retrieved May 8, 2024 from <https://scholar.lib.vt.edu/ejournals/vaes/00-1.pdf>

The conversion of mobile homes from personal property to real property was once a serious barrier in Virginia to using manufactured housing as a tool to increase affordable housing options across the Commonwealth. However, in 2014, the General Assembly passed a law establishing a process for the conversion of mobile homes from personal property to real property if the owner of the unit also owns the land, and Virginia has streamlined and improved the process multiple times since 2014. The process requires a homeowner to affix the unit to a permanent foundation, surrender their title to the Department of Motor Vehicles, and obtain a title from their local assessor's office. However, this option is not available to individuals who own the unit but pay lot rent for the land underneath the unit. In addition to making it more difficult for a household to build wealth, structuring manufactured home units as chattel instead of real property also makes it more difficult to access several forms of financing to purchase a unit. Unlike a home mortgage, chattel loans typically have shorter terms and higher interest rates and are more like an automobile loan than a home loan. Some federal programs like FHA Title II loans can assist homeowners who purchase their units as personal property, but most programs (FHA Title I and USDA Rural Development Section 502 for example) require a property to be titled as real property in order to access financing. This is why Virginia will prioritize applications for PRICE funding that allow for long-term affordability and ownership options for residents, including community land trusts, resident-controlled cooperatives, and parks that are partitioned to allow for conversion to real property and the enforcement of deeds or covenants. Prioritizing these ownership structures will make it easier for residents of parks to build wealth through ownership and to ensure the required long-term affordability.

Finally, infrastructure costs in rural areas tend to be higher than in more urban or suburban areas because they may not have feasible utility lines to connect to that are able to serve the volume of water and sewer than would be necessary for a manufactured home park, and they often use septic systems instead. In more urban parts of the state, particularly in Northern Virginia and in the urban crescent (which includes Northern Virginia, the Richmond region, and Hampton Roads), land can be very expensive, and it may be difficult to aggregate and purchase enough land to develop new manufactured home communities.

Barriers for Protected Class Groups in the Project Area

In communities across the Commonwealth where at least 10 percent of the housing stock is made up of mobile homes, the large majority of residents are white. The percentage white across localities ranges from 35.96 percent in Greensville County to 97.4 percent in Dickenson County. On Virginia's South side,

four plurality-Black localities have at least 10 percent mobile homes. Those counties are: Brunswick (55.03 percent Black), Greensville (54.5 percent Black), Sussex (44.24 percent Black), and Charles City Counties (44.24 percent Black). In six Virginia localities with at least 10 percent of the housing stock being mobile homes, Hispanic or Latino people make up at least 5 percent of the population. Those localities are: Henry (5.86 percent Hispanic/Latino), Greene (6.28 percent Hispanic/Latino), Lunenburg (5.5 percent Hispanic/Latino), Richmond (7.38 percent Hispanic/Latino), Accomack (9.11 percent Hispanic/Latino), and Northampton (9.25 percent Hispanic/Latino) Counties. However, the previously referenced study found that Latinos are disproportionately represented in mobile home communities within the Richmond metro area in Central Virginia. Other racial groups make up very small proportions of the localities in Virginia with large amounts of mobile or manufactured housing.

Black and Latino homeowners and renters face persistent setbacks in the housing markets. Black Americans deal with the long-term effects of institutionalized racism in the housing market that have segregated them from neighborhoods where residents of other races may live and have historically confined them to lower opportunity areas. The current racial patterns in neighborhood segregation are echoes of *de jure* segregation that was enforced by governmental entities and the real estate industry throughout history. Homes in majority Black neighborhoods are worth about 23 percent less than comparable homes in majority white neighborhoods⁴⁰, and homeownership levels are much lower for Black households (48 percent) than white households (73 percent)⁴¹, making it more difficult for Black families to build wealth through home equity than white families. Black neighborhoods often have less access to quality jobs, more exposure to environmental hazards and industrial uses, and fewer parks and amenities than white neighborhoods. Additionally, Black renters may experience ongoing race-based discrimination in both the homeownership and rental markets. Latinos face some of the same challenges, particularly around ongoing discrimination in the market, and though they do not have the same historical experience of segregation and oppression as Black households, they often also reside in

⁴⁰ Perry, A. Rothwell, J., and Hashbarger, D. (2018). *The Devaluation of Assets in Black Neighborhoods: The Case of Residential Property*. The Brookings Institute. Retrieved May 8, 2024 from https://www.brookings.edu/wp-content/uploads/2018/11/2018.11_Brookings-Metro_Devaluation-Assets-Black-Neighborhoods_final.pdf

⁴¹ U.S. Census Bureau. (2022). Tenure (White Householder Alone) *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25003A*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B25070?q=tenure%20by%20race&d=ACS%205-Year%20Estimates%20Detailed%20Tables>

U.S. Census Bureau. (2022). Tenure (Black Householder Alone) *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25003B*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B25070?q=tenure%20by%20race&d=ACS%205-Year%20Estimates%20Detailed%20Tables>

lower-opportunity racially concentrated communities. Latino households, and many other types of households, may have an additional barrier to quality, affordable housing—language. Limited English-speaking households may struggle to understand the legal contracts involved in homebuying or renting, as well as have difficulty communicating with landlords or other housing market actors.

In most localities with a large amount of manufactured or mobile housing, households with children make up somewhere between a quarter and a third of all households, and those over age 55 range from a quarter to half of the population. Women make up between 37 (Greensville County) and 54 percent (Essex County) of the population in each of these localities. Families with children, women, and single parents may have more difficulty finding safe and suitable housing on the market and may face discrimination.

The foreign-born population is relatively small in most of these localities ranging from near zero to about 8 percent in Accomack and Montgomery Counties. In both of those counties, about 6 percent of residents are also non-citizens. A small but meaningful 7 percent of manufactured home residents in Virginia in 2017 were non-citizens. Non-citizens face particularly limited housing choices because they lack the documentation and financing to buy a home or access many apartments. They are ineligible for most federal assistance programs, and often pay higher interest rates and down payments than other households.

The percentage of individuals with disabilities are quite high in these counties, especially those in far Southwest Virginia, where the disability rate is as high as 35 percent. Individuals with disabilities may face difficulties with finding housing that is accessible to them, and they may face discrimination from landlords who do not want to make reasonable accommodations for persons with disabilities.

Above and beyond the protected classes in the Fair Housing Act (race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status and disability), Virginia also protects individuals on the basis of age, military service, and source of funds. Virginia is working to increase fair housing testing and enforcement efforts statewide and increase educational efforts for landlords, tenants and other actors in the real estate market, and support the creation of sufficient affordable and accessible housing in order to address these barriers.

Soundness of Approach

Project Description, Management, and Impact

What are your vision and goals?

The Commonwealth of Virginia's goals with the statewide, competitive application for PRICE funding are to support approximately five projects by eligible applicants to stabilize and improve the material conditions of MHCs and their residents by successfully braiding funding sources. As a state grantee, Virginia would be able to direct funds towards smaller organizations and projects that require grants smaller than \$5 million or do not have the capacity to apply directly for federal funds. The Commonwealth of Virginia would be able to responsibly steward these funds on their behalf while also ensuring reach beyond high-capacity localities and organizations to those who need this funding the most. With the cooperation of other state partners, it is envisioned to increase the number of resident-controlled communities or cooperatives in the state during the grant time period. This will increase the number of eligible applicants as well as preserve some of the most vulnerable affordable housing options in the state.

With a \$25 million grant, Virginia could fund up to 150 new manufactured housing units, more than 1,100 repairs or rehabilitations, and/or six major infrastructure projects. We expect to fund some combination of each of these activities, as well as technical assistance, capacity building, and services. In the long term, a PRICE grant could keep hundreds of units affordable for decades into the future, and it could serve as an example of the potential role of manufactured housing going into the future.

Which eligible activities will you use to address the need(s) described in Need section?

Virginia DHCD intends to facilitate a statewide competitive funding opportunity to solicit applications from units of local government, planning district commissions and other regional entities, nonprofit organizations, and resident controlled manufactured home communities or cooperatives that are eligible for PRICE funding. DHCD will create a pool for loans and grants to fund:

- The construction, replacement, rehabilitation, repair, or preservation of manufactured housing units including through:
 - Installation of manufactured housing
 - Repair, rehabilitation, or reconstruction of units
 - Improvements to accessibility

- Acquisition of manufactured housing units, MHCs, or lots on which manufactured units are sited⁴²
- The installation or improvement of infrastructure that serves manufactured housing communities including:
 - Utility lines and hookups
 - Broadband
 - Public facilities
- Improvements to resilience to natural disasters at manufactured housing communities through:
 - Enhancing the resilience of infrastructure to extreme weather, natural hazards, and disasters
 - Installing flood and drainage improvements
 - Weatherization and safety enhancements on manufactured home units
 - Testing and remediation of contaminants
- Voluntary support services:
 - Relocation assistance
 - Housing mobility counseling
 - Eviction prevention
 - Down payment assistance, homebuyer education, and appraisal programs
 - Assistance with converting MHCs to resident-controlled entities
- Technical assistance and capacity building
- Administrative costs

DHCD will develop program guidelines, application questions, and a scoring matrix in alignment with its Consolidated Plan, available data on the needs of MHCs, and input from stakeholders. Applicants will be required to show that their projects will meet one of the Community Development Block Grant (CDBG) National Objectives and that they will be able to maintain a minimum of fifteen years of affordability of manufactured housing units, with preference given to projects which demonstrate a mechanism for longer affordability timelines.

⁴² DHCD does not fund acquisition-only projects, so this activity must be paired with another activity.

The chart below provides an outline of Virginia’s proposed scoring matrix, with special considerations noted in the right column. If awarded funds, Virginia will work with stakeholders to hold a more robust input process in order to develop its program guidelines and scoring matrix.

Table 1: Proposed Scoring Matrix and Special Considerations

| Category | Special Considerations |
|----------------------|--|
| Need (30 points) | <ul style="list-style-type: none"> • Data on housing affordability generally and manufactured housing need • Locality Distress Criteria • Community Disaster Resilience Zones |
| Approach (30 points) | <ul style="list-style-type: none"> • Mechanisms for ensuring at least 15 years of affordability • Addressing environmental and climate risks • Opportunities for home and land ownership and/or resident-controlled cooperatives • Accessibility |
| Capacity (30 points) | <ul style="list-style-type: none"> • Experience managing other grants • Experience with manufactured housing |
| Leverage (10 points) | <ul style="list-style-type: none"> • Private or local leverage • Braiding with other DHCD funds |

As discussed above, manufactured and mobile housing in Virginia serves an extremely important role in the housing ecosystem by providing naturally occurring affordable housing units to low-income families across the Commonwealth. However, many residents still struggle with the quality, affordability, and accessibility of their homes.

Virginia will prioritize housing quality issues that accompany this aging housing stock in order to keep Virginians housed in units that are currently available to them but are deteriorating. Through the repair, rehabilitation, and reconstruction of existing units that were built after 1976 and the replacement of units constructed before 1976, Virginia will preserve units that are already affordable to their residents. As a part of this activity, the Commonwealth can also address two emerging matters of concern—an aging population and increasing pressures from natural hazards and extreme weather. The share of seniors in Virginia is growing faster than other age groups, and by 2040, the number of Virginians over

75 will have more than doubled since 2010.⁴³ Residents in manufactured housing units are an older population than Virginians overall (median age 59, compared to 39 for the state as a whole⁴⁴) and more likely to have a disability (30 percent compared to 13 percent for the general population⁴⁵). In addition to improving the quality of housing, this activity will make manufactured housing units more accessible to older Virginians and those with disabilities. It will also fund improvements to manufactured housing units that will enhance their resilience to natural hazards, extreme weather, and natural disasters. As discussed previously, large swaths of Virginia are exposed to potential flooding hazards. Along the coast, localities are exposed to coastal flooding and sea level rise, as well as potential damage from tropical storms and hurricanes. Inland, particularly in the mountainous parts of the state, communities are prone to riverine flooding and flash floods from heavy rainfall. Potential improvements that DHCD will fund include but are not limited to elevating units, roof ties, and stormwater and drainage systems.

Virginia will also fund installation of new, affordable manufactured housing units. These units have already been shown to provide a naturally occurring affordable housing option for many of Virginia's lowest-income households. In areas where traditional housing developments may be too expensive or the lack of affordable housing developers or contractors leads to a dearth of housing possibilities, the installation of new manufactured housing offers promise for the provision of much-needed affordability.

Next, Virginia will fund projects that install or improve infrastructure in manufactured home communities. In particular, stakeholders have mentioned that water and sewer systems are often lacking in MHCs, and the data shows that only about half of manufactured home residents are connected to public sewer systems. Further, stakeholders have shared that with redevelopment of MHCs already in planning or predevelopment stages, a significant portion of the hard costs of projects are directly related to the minimal capacity of rural water and wastewater systems. Virginia could help to improve existing systems or create new portions of these systems with PRICE funding.

⁴³ Virginia Department of Housing and Community Development and Virginia Housing. (2022). *HB854 Statewide Housing Study: Current Efforts, Future Needs, New Strategies*. Retrieved May 7, 2024, from <https://dmz1.dhcd.virginia.gov/HB854/pdf/hb854-full-report-print.pdf>

⁴⁴ U.S. Census Bureau. (2022). Age and Sex. *American Community Survey, ACS 1-Year Estimates Subject Tables, Table S0101*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSST1Y2022.S0101?q=median age&g=040XX00US51>.

⁴⁵ U.S. Census Bureau. (2022). Disability Characteristics. *American Community Survey, ACS 1-Year Estimates Subject Tables, Table S1810*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSST1Y2022.S1810?q=disability&g=040XX00US51>.

Voluntary support services, technical assistance, capacity building, planning and administrative costs will be eligible for funding in tandem with one of the above listed activities, with an emphasis on minimizing displacement of current MHC residents and a requirement to serve households with incomes at or below 60% of the Area Median Income. As stated previously, Virginia DHCD will preference projects that can demonstrate an ability to create longer-term affordability guarantees. This could include enforcement structures such as sites placed into land trusts with affordability restrictions on lot rents and household incomes, sites where the homes can have resale restrictions enforced with deeds of trust or conversion of manufactured home parks into cooperatives with language requiring affordability in their Articles of Incorporation. In Virginia's 2025-2026 biennium budget, \$5 million was allocated to DHCD for a pilot program that will help resident-controlled cooperatives purchase MHCs.

Virginia DHCD will work in partnership with any PHA within a project area and/or Virginia Housing's state-wide voucher program administrators to develop adequate criteria to ensure PRICE-funded activities result in voucher-eligible housing units, and that any management entity is trained in the process of accepting vouchers as lot rent payments, as currently eligible within the voucher programs.

What is your timeline and key tasks along that timeline?

Estimated Project Start Date: October 2024 after expected issuance of awards

Public Input Sessions on the Development of Statewide Program: November-December 2024

Development of Program Guidelines, Application Questions, and Scoring Matrix: January-June 2025

Round 1 Application Period and How-To-Apply Workshops: July-August 2025

State Application Review: September-December 2025

Contract Negotiation: January-March 2026

Round 2 Application Period and How-To-Apply Workshops: July-August 2026

Round 2 State Application Review: September-December 2026

Round 2 Contract Negotiation: January-March 2027

Required Obligation of All Funds: September 2027

All Construction Projects Completed: September 2031

Close-Out Period: January-September 2032

Required Expenditure Deadline: September 30, 2032

What is your budget?

The Commonwealth in Virginia requests a total of \$25 million with 10% set aside for administration. \$2.5 million in administrative costs will cover salaries and related costs for two full time equivalent (FTE) employees over the course of 8 years, or until all funds must be expended in 2032.

The remaining \$22.5 million would be provided as grants and loans to eligible applicants who score the highest in a competitive grant application cycle as long as scores are above a designated threshold. The competition will be divided into two years of application cycles, with \$11,250,000 offered each year. Any unallocated funds will roll over to the second year, potentially increasing the total available amount in the second cycle. Each applicant will be eligible for up to \$5,000,000 in hard costs, with an additional \$100,000 available for local administration and compliance expenses.

What are the projected impacts of your activities if implemented?

Virginia DHCD expects that approximately five projects will be selected for the \$22,500,000 PRICE grant funds. These five projects are projected to increase their community's access to safe, sanitary, and affordable housing. As noted above, Virginia's older residents of rural localities are disproportionately impacted by risks of extreme weather events, incidence of disability, and high housing costs for low-quality living quarters. Virginia intends to offer interested and eligible applicants an opportunity to expand on the work they are already performing in their communities.

Virginia anticipates that the installation of a new unit will cost \$150,000 on average, so a \$5 million grant could result in the installation of between 30 and 35 new units. Typical home repairs cost approximately \$20,000 on average, so a maximum grant could serve 250 households with rehabilitation and repair services. Virginia's DHCD program currently caps its CDBG infrastructure projects at \$3.5 million and that program has been successful in the development and repair of water and sewer lines, utility hookups, and public infrastructure needs, so \$5 million will be a sufficient amount to make a meaningful difference in the feasibility of infrastructure projects as well.

Affordability and Equity

How will you ensure the availability of affordable manufactured housing options to LMI households?

The Virginia DHCD PRICE-funded program will require applicant organizations demonstrate their ability and capacity to successfully determine income of residents or program beneficiaries by outlining the organizations' previous experience with income-qualification programs such as CDBG or other Federal or State housing programs and rental voucher programs. Grantees will be required to perform income certifications and report on LMI status. Preference will be given to applications which provide for park or land ownership opportunities for residents, or land ownership held by an organization which records affordability provisions through deeds of trust or other organizational documents that can guarantee long-term availability

Virginia's biennium budget for July 1, 2024, through June 30, 2026, includes \$5,000,000 to be used in the establishment of a pilot program by Virginia DHCD to assist residents and non-profits with acquiring manufactured home parks located in Virginia. These funds will be awarded as low- or no-interest loans to associations of residents of MHCs or non-profits which provide, construct, or renovate affordable housing, and Virginia DHCD shall prohibit loans which result in displacement of residents at time of acquisition. These funds can be paired with PRICE funding in order to create ownership and financial structures that can both guarantee long-term affordability for LMI beneficiaries and offer the potential for homeownership and wealth-building.

What protections will be in place for residents?

The Virginia Residential Landlord Tenant Act (VRLTA) and the Manufactured Home Lot Rental Act (MHLRA) provide protections for tenants in Virginia. Under the VRLTA, a landlord is required to provide a written lease, but if the landlord fails to do so, a lease is assumed to be 12 months and nonrenewable. Landlords must disclose the existence of mold, the name and address of the owner of the property, and any notices of sale or foreclosure. Tenants may not be charged more than \$50 for application fees or more than two months' rent for a security deposit. Late fees may not be more than 10 percent of the rent or 10 percent of the unpaid balance, whichever is less. Tenants are entitled to a receipt for rent paid if requested. Tenants are entitled to privacy and to a fit and habitable premises. If the dwelling is uninhabitable at the time of move-in, a tenant may terminate the rental agreement and receive a full refund. If a landlord fails to address a serious maintenance issue in a unit within 14 days of being notified, residents in Virginia have the right to repair and deduct the amount of the repair from the rent. Landlords who own more than four units must inform a tenant in writing of any rent increases at least

60 days in advance of the end of the lease term. In the case that a landlord moves to evict a tenant, they must follow the established court proceedings. A landlord may not exclude a tenant from the premises, interrupt and essential service, or make a unit unlivable. These assurances apply to anyone who rents a unit, including a manufactured home unit.

The MHLRA additionally applies to manufactured home parks of five or more units in which manufactured homes are owner-occupied, but residents pay lot rent. Landlords are required to provide a written lease for the lot. In addition to many of the protections in the VRLTA which are also applicable to lot leases, a landlord cannot charge an entrance fee, a commission on the sale of a manufactured home in the park (unless the tenant employs the landlord to perform a service in connection with the sale), a fee for cable, internet, or satellite service unless the landlord is the service provider, or an exit fee. Landlords must allow guests access to the tenant's manufactured home site without charges or registration. Landlords may not unreasonably restrict the sale or rental of units within the park. A landlord may evict a tenant only for nonpayment of rent; violation of a building or housing code; or violation of the lease or law affecting health, safety, or welfare. A landlord who wants to sell the park must give 90 days' advance notice to each tenant and to the Department of Housing and Community Development (DHCD). If the landlord receives an offer to purchase, the landlord must give 60 days' advance notice to each tenant and to DHCD and consider offers from group of at least 25% of park residents. A landlord who wants to sell the park to a buyer who will change its use must give 180 days' advance notice to each tenant. Within the 180-day period, the landlord must give each resident up to \$5,000.

Virginia laws meet and exceed those provided by Fannie Mae and Freddie Mac. A market-based property valuation for manufactured homes demonstrated by a well-developed sales comparison approach to value that is further supported by the cost approach to value is required upon sale.

How does your proposal encourage access to resources and financing, especially for underserved communities and persons?

DHCD will design an application for PRICE projects which allocates additional points for projects which can demonstrate a mechanism for ensuring longer term affordability, either between fifteen and thirty years, or an increased points preference for thirty or more years. State-allocated funding to create a pilot program for resident or nonprofit organizations' acquisition of mobile home parks provide a greater incentive for these extra points and provide some funding towards a variety of enforcement mechanisms which could include land trust ownership of sites, resident-led equity partnerships in

ownership, or the installation of mobile or manufactured homes affixed to a permanent foundation and therefore eligible for land deeds and restrictive covenants.

The Virginia proposal for PRICE funds leverages DHCD's experience funding the Vibrant Communities Initiative (VCI), an innovative community development and housing funding approach that was used to successfully encourage applications for braided funding source projects. These developments combined units of local government's experience with and ability to utilize CDBG funds for infrastructure and community development projects with non-profit housing developers' skill sets and access to state and federal funds for hard costs of housing development. This streamlined approach made the ability to leverage multiple funding streams that Virginia DHCD administers for the state easier to approach and combine with private and governmental dollars available at the local level.

Virginia's PRICE program will be modeled after VCI, with the added benefit of a state program which allocates \$5,000,000 to DHCD to create a pilot program loaning funds at no- or low-interest to support residents or non-profit organizations in the acquisition of land currently used for mobile or manufactured home parks. Virginia DHCD believes that creating a program which encourages work similar to that of existing partners and stakeholders and also creates access to some acquisition funding, the state will more successfully reach Virginia residents which are underserved and have previously had limited financing options.

One example of an existing partner to this work is Greater Charlottesville Habitat for Humanity, which acquired the Southwood Mobile Home Park over ten years ago and has begun a comprehensive redevelopment of the full project site with funding from DHCD. This project has included state CDBG-funded wastewater infrastructure, street, curb and gutter installations, as well as state- and federally-assisted home development including single family homes, duplexes, condos and LIHTC-supported rental apartments to provide all residents access to the type and cost of housing which feels most appropriate to their individual families. Habitat for Humanity has leveraged the considerable investment from the state and the localities of Charlottesville City and Albemarle County and has provided various benefits to families like private savings matching funds to defray closing costs and 0% interest mortgages.

Virginia DHCD believes the PRICE program will allow current development partners of the Department with access to fewer resources, like the Greater Charlottesville Habitat for Humanity affiliate, to

capitalize on the groundwork already done by those higher-capacity organizations and bring similar work to the balance of the Commonwealth.

Environment and Resilience

What significant hazards could impact your project site(s)?

Virginia is vulnerable to several natural hazards depending on the location, ranging from sea level rise and hurricanes to earthquakes, wildfires, tornadoes, flooding, and extreme heat. Since 1980, there have been 109 confirmed weather or climate disaster events in Virginia with losses exceeding \$1 billion each. These events included 12 drought events, 5 flooding events, 3 freeze events, 50 severe storm events, 21 tropical cyclone events, and 18 winter storm events. The 1980–2023 annual average is 2.4 events per year (CPI-adjusted); the annual average for the most recent 5 years (2019–2023) is 6.4 events (CPI-adjusted).

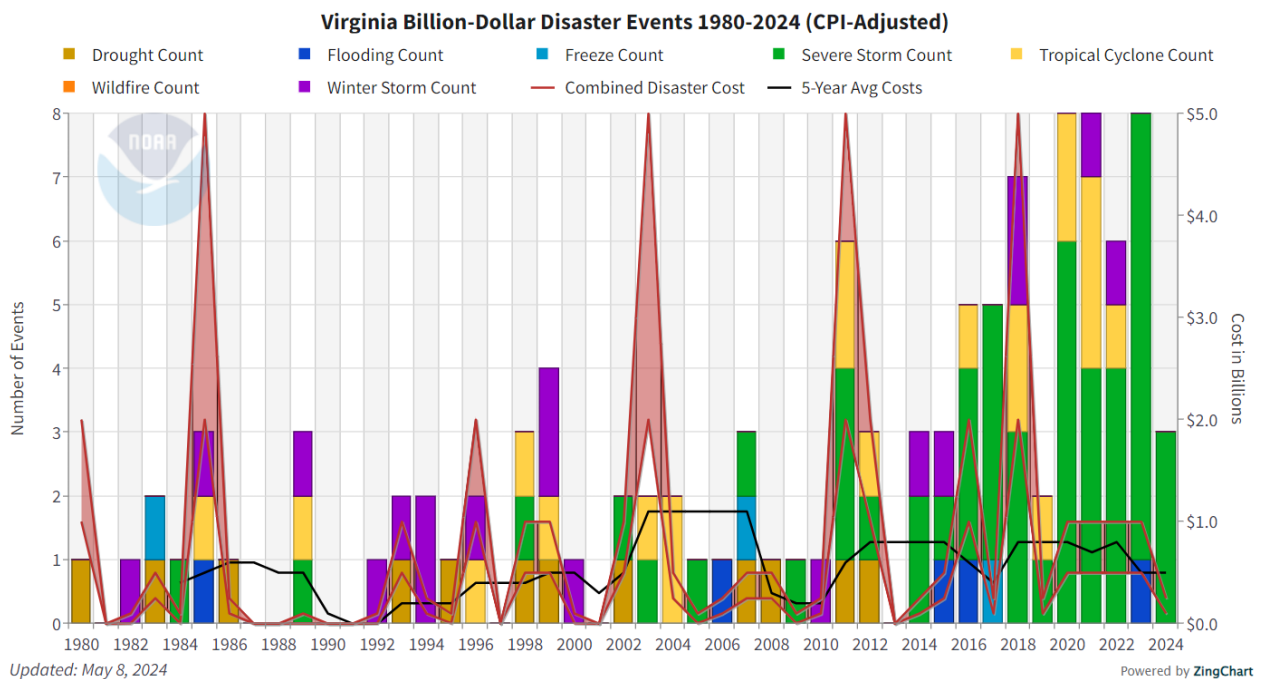


Figure 11: National Centers for Environmental Information. (2024). Billion Dollar Weather and Climate Disasters. National Oceanic and Atmospheric Administration.

These hazards affect residents of manufactured home units as they do all of Virginia, but those with lower incomes may be disproportionately harmed due to lack of ability to pay for disaster preparation or recovery. Additionally manufactured home parks may be placed on cheaper land than other

subdivisions, which may be more prone to flooding and other disasters and may be more vulnerable to damage during severe weather or climate events due to their age and the quality of housing.

In addition to climate risks and extreme weather, stakeholders identified several other environmental hazards that they have encountered in manufactured housing units including poor indoor air quality, mold and moisture, water and sewer leaks, electrical hazards, and pests.

How will your activities address the current and future threat of natural hazards, extreme weather, and disaster events?

Our statewide program will focus on the installation, rehabilitation, and repair of mobile and manufactured home units across the state as well as infrastructure installation, repair, and enhancement. Part of the Commonwealth's scoring criteria will address whether the applicant has identified environmental and climate risks in their project area and how they intend to address those hazards. Virginia will fund projects that include environmental remediation and resilience efforts, projects that provide improvements to units in order to rectify hazards they are experiencing presently, and projects that prepare for potential future hazards. LMI households living in manufactured home units will benefit from these activities which may improve the environmental quality and safety of their homes and their MHCs more generally. We will request information from applicants regarding repetitive losses and recent events in their project areas and ensure that those who have experienced repetitive or recent losses address the potential for future losses and use weather and climate appropriate materials and other strategies such as raising units to prevent future losses.

How does your proposal help advance Environmental Justice?

Environmental Justice is a movement which acknowledges the ways marginalized communities, typically those of low financial means, immigrant communities, and/or communities of color, have been harmed by proximity to potentially harmful land uses such as hazardous waste pollution or resource extraction, or have been harmed by the loss of land or resource rights. Virginia DHCD already administers programs which remediate household lead hazards, upgrade or install wastewater projects, create indoor plumbing improvements for LMI homeowners and renters, and reimburse property owners whose land or structures have been damaged by flash flooding, all of which are results of the disparate impact that environmental injustice has caused poor or marginalized communities. By prioritizing projects that serve LMI households and those that remediate or prepare for environmental hazards, this program will reduce the exposure to environmental health hazards experienced by low-income families. Due to the long history of both *de jure* and *de facto* segregation in the United States, differential wealth and income

trajectories, and other exclusionary policies and attitudes, low-income populations are disproportionately communities of color, and these populations are disproportionately affected by poor housing quality, housing unaffordability, and environmental risk. By offering funds that specifically serve to raise the quality of life for LMI populations, particularly those vulnerable to environmental disaster, PRICE funds will be disproportionately targeted towards bringing raising the quality of life of the most marginalized populations in Virginia, thereby creating more equity.

Community Engagement

How will you seek and encourage diverse stakeholder participation?

The Commonwealth has a strong history of outreach and stakeholder participation through DHCD's Consolidated Plan and Annual Action Plan processes for HUD CPD funds. These existing relationships and contacts will enable DHCD to quickly and efficiently assemble representatives of local governments, fair housing organizations, nonprofit developers of housing, community development organizations, and tenants of manufactured housing communities. As part of the process for developing this application, DHCD hosted two stakeholder input sessions, one of which was in person, that were well attended and resulted in positive and actionable feedback. Prior to releasing an application for a statewide competition, DHCD will further engage stakeholders in a more robust process of developing guidelines and scoring for the program that will result in the best possible applications and projects being funded. Further, the Commonwealth will incorporate a requirement for stakeholder participation in its statewide competitive application so that grantees will also continue the work of community engagement. Engaging with the community—both with organizations and local governments that make up DHCD's grantees and with the public at large—is an essential piece of the development and revision of DHCD programs and is a core value of the agency.

How does your proposal align with existing community plans and policies?

The Commonwealth will design an application process for statewide PRICE funds that requires information provided by applicants to address their localities' adopted plan and policies with regard to safe, affordable housing and retaining MHCs as a housing option. Virginia currently requires localities to include as part of their Comprehensive Plans a section on how the locality intends to use manufactured housing to promote affordability, so PRICE funds will likely align with those sections of many localities' Comprehensive Plans. The promotion of manufactured housing also aligns well with Virginia's Consolidated Plan and with state efforts to increase housing production and reduce costs.

Additionally, Virginia's legislature and statewide housing advocates have prioritized the preservation and outreach to Manufactured Housing Communities. This statewide PRICE proposal will leverage partnerships with housing advocates and maximize statewide funding for MHC's.

Capacity

What experience do you have managing projects?

The Virginia DHCD staff manage the full lifecycle of CDBG construction and infrastructure projects annually, including running competitive application processes with pre-application technical assistance on grant writing, threshold requirements and scoring, negotiating contracts with units of local government, providing feedback and technical assistance on the bid processes for contractors and subcontractors, reviewing timelines and written project updates, and inspecting work to ensure completion to the standards mandated by the contracts.

Virginia DHCD staff manage lead remediation and abatement work state-wide, and the rental and homeownership development staff has managed new loan contracts across nonprofit and for-profit development organizations valued at \$300 million over the last twenty-four months, ultimately helping to fund 6,500 units of rental housing through permanent mortgages post-completion and 100 units of homeownership housing in fee simple and land trust developments through hard-cost reimbursements and deeds of trusts to organizations and homeowners.

DHCD additionally runs programs like the Weatherization Assistance Program, Weatherization Deferral Repair, the Essential Home and Accessibility Repair Program, and Indoor Plumbing Rehabilitation which work with homeowners on repairs and improvements to accessibility and energy efficiency of housing, including mobile and manufactured homes.

What is your experience using grant funds?

Virginia DHCD is the state-wide administrator of federal Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and National Housing Trust Fund (NHTF) funding programs and has significant experience over the lifetime of those programs funding infrastructure and home construction projects. This includes evaluating competitive applications for feasibility of all activities proposed, working closely with units of local government as sub-recipients and private, non-profit organizations as sub-grantees, and closeout of federal and state grant programs and fiscal years.

Who are your key staff?

DHCD's key staff for PRICE funding include permanent staff whose roles already encompass federal grants management experience for infrastructure, community development, and housing development projects statewide, assigned fiscal management team members, and the executive leadership of the community development and housing team, as well as policy and legislative affairs team.

The involvement of Virginia DHCD staff in the rollout of the PRICE application will include technical assistance from DHCD teams which support housing stability through funding administration for Permanent Supportive Housing (PSH), tenant based rental assistance and partnership with lead agencies for all Virginia Continuums of Care; DHCD teams which actively support non-entitlement localities in the current administration of state CDBG funds and the required federal compliance with Section 3, bid processes, and grant monitoring; and DHCD teams which currently support the Commonwealth's Affordable and Special Needs Housing (ASNH) program and HOMEownership Down Payment Assistance (HOME DPA) programs, which award funds towards the construction or rehabilitation of affordable housing, and provide subgrantees with federal funds to offset down payment and closing costs for prospective homeowners of limited incomes.

What is your experience promoting racial equity?

Virginia DHCD manages several federal funding sources, which require reporting on the race and ethnicity of beneficiaries. The table below shows the number of beneficiaries of each of the federal Community Planning and Development (CPD) formula grants, as reported in Virginia's 2022-2023 Consolidated Annual Performance Evaluation Report (CAPER).

Table 2: Virginia Table of Assistance to Racial and Ethnic Populations by Source of Funds

| | CDBG | HOME | HOPWA | ESG | HTF |
|---|--------------|-----------|------------|--------------|----------|
| White | 836 | 9 | 112 | 1,046 | 0 |
| Black or African American | 300 | 45 | 181 | 2,241 | 8 |
| Asian | 8 | 18 | 1 | 38 | 0 |
| American Indian or American Native | 3 | 0 | 1 | 17 | 0 |
| Native Hawaiian or Other Pacific Islander | 2 | 0 | 0 | 2 | 0 |
| Total | 1,149 | 72 | 295 | 3,344 | 8 |
| Hispanic | 16 | 1 | 11 | 278 | 0 |
| Not Hispanic | 1,133 | 71 | 284 | 3,327 | 8 |

Virginia's CDBG funds do primarily benefit white residents of the state (72 percent of beneficiaries are white, compared to 59 percent of Virginia's total population, which is white). However, this is because Virginia's CDBG grants are solely for non-entitlement communities, which are more rural and whiter

than the state as a whole. About a quarter of CDBG funds served Black or African American beneficiaries. The other four funding sources all disproportionately serve Black or African American beneficiaries, who make up 18 percent of the state's population but 63 percent of HOME beneficiaries, 61 percent of HOPWA beneficiaries, 67 percent of ESG beneficiaries, and 100 percent of Housing Trust Fund beneficiaries. Hispanic or Latino households and Asian households also make up meaningful percentages of the beneficiaries of most programs. While DHCD does not allocate funds on the basis of race, it does provide funds for housing and community development with consideration of the areas of greatest need. Often, due to historical policies and patterns, racial minorities experience worse housing outcomes and lower quality of life than their white counterparts, and DHCD as an agency works to rectify those differences. By considering need as part of our scoring, funding is allocated in a way that prioritizes those who are underserved, which often includes communities of color.

[What is your experience completing environmental reviews?](#)

DHCD's staff coordinates and completes both NEPA and non-NEPA environmental reviews for the federal funding sources administered by the Department and has performed these actions since the inception of required reviews for these federal sources.

[Are you familiar with cross-cutting federal requirements?](#)

DHCD's staff currently incorporates compliance with cross-cutting federal requirements into the contract and monitoring process including, but not limited to, Uniform Relocation Act, Davis-Bacon wage requirements, Uniform Administration and audit requirements, and non-discrimination and fair housing requirements.

Match or Leverage

DHCD's application process for PRICE will include preferential scoring to projects which have private or local government funds as matching or leveraged funds for the proposed project. DHCD has been allocated \$5,000,000 to develop a pilot program to assist in resident or non-profit ownership of mobile home parks and, if awarded PRICE funds, will ensure the allocated funds for acquisition are positioned to increase opportunities for leverage in approved PRICE applications. For the upcoming fiscal year, DHCD will administer approximately \$35,000,000 in federal CPD funds and an additional \$85,000,000 in state allocated funds towards infrastructure, community development, and housing construction and rehabilitation which provide ample opportunity for prospective PRICE projects to leverage internally available DHCD funds. Virginia has a biennium budget process, and at least \$70,000,000 of the housing development funds are non-reverting, which provides an increased level of stability for DHCD's capacity to leverage funding into PRICE projects.

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Long-Term Effect

With a \$25 million grant, Virginia could fund up to 150 new manufactured housing units, more than 1,100 repairs or rehabilitations, or six major infrastructure projects. We expect to fund some combination of each of these activities, as well as technical assistance, capacity building, and services.

DHCD's PRICE application will prioritize those developments which ensure a mechanism for affordability of a minimum of fifteen years. Due to the complex nature of mobile home park finance, DHCD will endeavor to allow the greatest amount of flexibility possible in the structure of those mechanisms proposed by applications. DHCD will work to create opportunities for layering PRICE funding with the \$5,000,000 allocated by the state for a pilot program to encourage resident ownership of existing parks.

In the long term, a PRICE grant could keep hundreds of units affordable for decades into the future, and it could serve as an example of the potential role of manufactured housing going into the future. If we are awarded this grant, Virginia could make a meaningful impact the availability and quality of affordable housing across the state for some of our most vulnerable populations, including the elderly and immigrant communities. The impact could serve as a model to encourage continued use of federal and state funds for manufactured housing and environmental resilience well into the future.

Advancing Racial Equity

As of the most recent decennial census, Virginia was 59 percent white, 18 percent Black, 11 percent Latino, 7 percent Asian, less than 1 percent American Indian, Alaska Native, Native Hawaiian, Pacific Islander, or some other race, and 5 percent multiracial. While data on the race of residents of mobile and manufactured units is limited, a study on residents of manufactured housing in Central Virginia were primarily white, but also include a disproportionately large share of Hispanic or Latino residents.

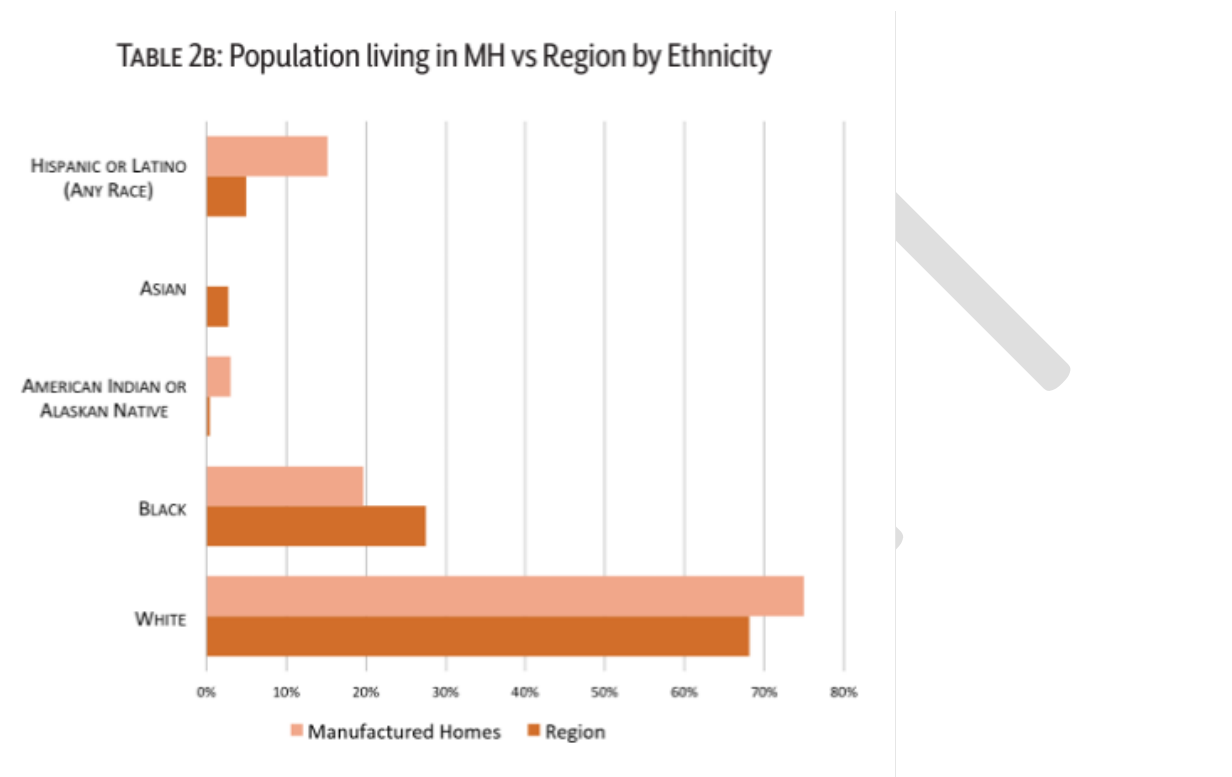


Figure 12: Brown, J. and Knopf, J. (2016). An Assessment of Central Virginia’s Manufactured Housing Communities: Understanding the Conditions, Challenges, and Opportunities. HDAvisors.

In communities across the Commonwealth where at least 10 percent of the housing stock is made up of mobile homes, the large majority of residents are white. The percentage white across localities ranges from 35.96 percent in Greensville County to 97.4 percent in Dickenson County. On Virginia’s South side, four plurality-Black localities have at least 10 percent mobile homes. Those counties are: Brunswick (55.03 percent Black), Greensville (54.5 percent Black), Sussex (44.24 percent Black), and Charles City Counties (44.24 percent Black). In six Virginia localities with at least 10 percent of the housing stock being mobile homes, Hispanic or Latino people make up at least 5 percent of the population. Those localities are: Henry (5.86 percent Hispanic/Latino), Greene (6.28 percent Hispanic/Latino), Lunenburg (5.5 percent Hispanic/Latino), Richmond (7.38 percent Hispanic/Latino), Accomack (9.11 percent

Hispanic/Latino), and Northampton (9.25 percent Hispanic/Latino) Counties. However, the previously referenced study found that Latinos are disproportionately represented in mobile home communities within the Richmond metro area in Central Virginia. Other racial groups make up very small proportions of the localities in Virginia with large amounts of mobile or manufactured housing.

The rate of cost-burdened households is much higher for Hispanic homeowners (29%) and Black homeowners (27%) than it is for white homeowners (17%). All other minorities also have higher-than-average homeowner cost burden rates. The rate of cost-burdened households among homeowners of color has declined since 2010; the likeliest cause of this change is the transition of previously cost-burdened homeowners to becoming renters as the result of the foreclosure crisis and subsequent recession. While all other racial groups have experienced a decrease in their share of cost-burdened renters, Black and Hispanic or Latino renter cost burden has increased since 2010. More than half of Black (51%) and Hispanic (52%) renters were cost-burdened in 2020; diminished hours and lost jobs during the pandemic put a large number of renters of color at risk of eviction and homelessness, so these numbers may have increased since the last CHAS data was released. At the same time a significant but comparatively smaller proportion of white renters (39%) were cost-burdened.

There are several barriers faced by persons or communities of color in terms of housing, infrastructure, and environmental harm. As discussed in the Needs section of the grant, Black and Latino homeowners and renters face persistent setbacks in the housing markets. Black Americans deal with the long-term effects of institutionalized racism in the housing market that have segregated them from neighborhoods where residents of other races may live and have historically confined them to lower opportunity areas. The current racial patterns in neighborhood segregation are echoes of *de jure* segregation that was enforced by governmental entities and the real estate industry throughout history. Homes in majority Black neighborhoods are worth about 23 percent less than comparable homes in majority white neighborhoods⁴⁶, and homeownership levels are much lower for Black households (48 percent) than white households (73 percent)⁴⁷, making it more difficult for Black families to build wealth through

⁴⁶ Perry, A. Rothwell, J., and Hashbarger, D. (2018). *The Devaluation of Assets in Black Neighborhoods: The Case of Residential Property*. The Brookings Institute. Retrieved May 8, 2024 from https://www.brookings.edu/wp-content/uploads/2018/11/2018.11_Brookings-Metro_Devaluation-Assets-Black-Neighborhoods_final.pdf

⁴⁷ U.S. Census Bureau. (2022). Tenure (White Householder Alone) *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25003A*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B25070?q=tenure%20by%20race&d=ACS%205-Year%20Estimates%20Detailed%20Tables>

home equity than white families. Black neighborhoods often have less access to quality jobs, more exposure to environmental hazards and industrial uses, and fewer parks and amenities than white neighborhoods. Additionally, Black renters may experience ongoing race-based discrimination in both the homeownership and rental markets. Latinos face some of the same challenges, particularly around ongoing discrimination in the market, and though they do not have the same historical experience of segregation and oppression as Black households, they often also reside in lower-opportunity racially concentrated communities. Latino households, and many other types of households, may have an additional barrier to quality, affordable housing—language. Limited English-speaking households may struggle to understand the legal contracts involved in homebuying or renting, as well as have difficulty communicating with landlords or other housing market actors.

Those who are low-income, communities of color, or have low English proficiency may have fewer institutions and organizations to advocate on their behalf and more difficulty organizing and identifying those with capacity to apply for or manage funds. Virginia DHCD offers significant outreach and technical assistance to any interested applicants in an effort to rectify these disadvantages. Racial minorities may have more difficulty purchasing housing and building wealth, due to reasons described above. Virginia DHCD will include services such as down payment assistance and homebuyer education as eligible activities, alongside acquisition, installation, rehabilitation and repair, which may help to address some of disparities in homeownership and wealth. The provision of hazard mitigation, weatherization and resilience improvements to communities most in need will additionally address differences in environmental exposure.

In its Analysis of Impediments to Fair Housing, Virginia also committed to taking the following steps:

- Increasing testing and enforcement efforts in the rental and sales housing markets to ensure all housing consumers are offered an equal opportunity to access housing options in their communities and publicizing results of testing programs;
- Increasing education efforts for landlords, leasing agents, and real estate professionals about their fair housing responsibilities and in particular, stress the importance of making reasonable accommodations for persons with disabilities;

U.S. Census Bureau. (2022). Tenure (Black Householder Alone) *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25003B*. Retrieved May 7, 2024, from <https://data.census.gov/table/ACSĐT1Y2022.B25070?q=tenure%20by%20race&d=ACS%205-Year%20Estimates%20Detailed%20Tables>

- Increasing education efforts for individuals seeking housing so they are aware when they are victims of discrimination and so that they are aware of their options to resolve the situation;
- Increasing enforcement of affirmative marketing of affordable housing;
- Increasing oversight of mortgage lending and denial practices;
- Offering first-time homebuyer education, affirmatively marketed to minorities;
- Continuing to support financial literacy and credit counseling initiatives;
- Increasing awareness regarding the availability of Federal Housing Administration (FHA) and other government supported loans;
- Increasing fair housing educational opportunities for renters and homebuyers.
- Increasing the availability of seminars and classes for housing providers regarding fair housing law and expanding such educational opportunities to include rural and non-metro areas;
- Providing up-to-date, relevant, and clearly written fair housing materials for individuals made readily available on multiple state websites and in housing providers' offices;
- Encouraging housing providers and other relevant stakeholders to utilize social media to inform both clients and landlords of fair housing policy;
- Continuing to support of federal, state, and local efforts to preserve and produce quality affordable housing;
- Continuing to support of partnerships between nonprofit, state, local, and federal partners to efficiently leverage resources for the production of affordable housing;
- Supporting public-private partnerships that create affordable and mixed-income housing;
- Supporting efforts that match appropriately priced housing with varied transportation options; and
- Promoting the use of housing databases such as those offered by the Virginia Housing Development Authority (VHDA), <http://www.virginiahousingsearch.com/>.

Affirmative Marketing

DHCD's federal application processes currently require a marketing plan to be submitted with a request for funding, and the staff would provide additional technical assistance to prospective applicants as needed to ensure compliance with fair housing requirements, and to encourage applications which creatively approach broad marketing throughout the local project areas to garner participation with any demographic groups or protected classes which would be unlikely or least likely to participate absent these efforts.

Managers of rental housing must conduct marketing and advertising activities in accordance with applicable fair housing laws and affirmative marketing requirements. These requirements ensure that all eligible applicants have an equal opportunity to rent PRICE-assisted units and provide maximum opportunity to persons with disabilities to rent the property's accessible units, if any.

An affirmative marketing plan fits into the property's overall marketing plan to ensure that the property serves a diverse cross-section of the population in the market area. The affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area that might not otherwise apply without special outreach. Affirmative marketing ensures that housing is available to qualified applicants without regard race, color, national origin, sex, religion, familial status, or disability.

Affirmatively Furthering Fair Housing

For each program year in which a PRICE contract is active, any grantee must take affirmative steps to further fair housing. To meet this requirement, the grantee must certify that it will undertake at least one fair housing activity in each project year.

Title VIII of the Civil Rights Act of 1968, as amended, makes it illegal to discriminate in housing based on the following factors:

- Race
- Color
- National origin
- Religion
- Sex or gender, including sexual orientation or gender identity
- Familial status (families with children under the age of 18 or who are expecting a child)
- Disability

Virginia additionally protects against discrimination on the basis of:

- Age (elderliness, considered to be 55+)
- Military status
- Source of funds

Any grantee of DHCD's PRICE grant will sign a Fair Housing Certification committing the grantee to take affirmative steps to further fair housing during each program year in which the PRICE contract is active.

The grant manager must ensure that at least one of the following actions (additional actions may be approved by DHCD) is completed during each program year. Examples of acceptable activities include:

- Adopt a resolution endorsing the concept of fair housing, including the specific rights included in the law, and advertise its wording in a display advertisement in a local newspaper;
- Adopt a proclamation declaring April as Fair Housing Month;
- Include a flyer about fair housing in the water bill and send it to every household in the grantee's locality;
- Partner with a technology class at the local high school to create a short advertisement or spotlight on fair housing to be aired on community access television;

- Run a fair housing public service announcement on local radio stations or the local community cable station throughout the month of April. Topics can include what are prohibited activities and where to file a discrimination complaint;
- Develop a page on the grantee's website concerning fair housing issues, including links to the Virginia Fair Housing Office and other resources available to protected groups;
- Add the fair housing logo to the grantee's official stationary;
- Provide all program beneficiaries with a copy of federal or state fair housing brochures;
- Host a booth at public community events and distribute fair housing brochures;
- Distribute copies of the federal or state fair housing brochures to persons attending project community meetings or required public hearings;
- Have a display on fair housing issues at local public libraries, schools or the grantee's administrative offices for at least thirty (30) days;
- Include a discussion on fair housing on the agenda of oversight boards or the local governing body;
- Provide funding for local fair housing groups or provide financial or technical assistance to local citizens wishing to organize such a group;
- Conduct public educational programs for local realtors and bankers, homebuyers, landlords, and/or grantee employees regarding fair housing issues, including their fair housing rights and responsibilities. This could include sponsoring a local fair housing workshop conducted by the Virginia Fair Housing Office;
- Attendance by a member of the local governing body or Chief Administrative Official and a second appropriate representative (realtor, banker, etc.) at a fair housing workshop approved by DHCD;
- Enlist the participation of local realtors, lenders and homebuilders in an agreement, and promotion of affirmative marketing, open housing and review of underwriting/credit criteria, etc. Publish such agreements in a local paper;
- Post one or more of the federal fair housing posters at the grantee's administrative offices for at least thirty (30) days;
- Sponsor a fair housing poster contest at local schools with the public voting on the winning poster and displaying it at the grantee's administrative offices and on the grantee's website;

- Develop a fair housing assistance program to make housing opportunities available in non-minority areas, monitor compliance and submit discrimination complaints to the state or federal government;
- Conduct a formal Assessment of Impediments (AI) study of local zoning, real estate and/or financing practices which affect housing choices of minorities and other protected classes; and
- Survey the special housing problems of minorities and women, determining any effects of discrimination and developing a plan to assist them in overcoming these effects.

The fair housing activity selected by the grantee must be a different one each program year.

Furthermore, all Fair Housing activities must be sufficiently documented, including records on funds provided, if any for such activities, so their completion can be verified during the compliance review.

Accepted documentation would include copies of brochures provided, along with a distribution list, or minutes of meetings where fair housing is discussed. DHCD already enforces this policy with all recipients of CDBG funds, and the PRICE funds would be administered using CDBG policies and practices.

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