

**HAFP-0095-West Virginia Housing
Development Fund
Treasury Feedback for Resubmission of Plan
West Virginia Housing Development Fund
Responses**

Please revise the HAF plan by providing a response to the question(s).

Completeness

- Your plan lists Erica Boggess as the Authorized Official, while the original application for HAF payments was signed by Governor James Justice. To ensure prompt payment upon approval, the Authorized Official needs to be the same as the signatory on the original application for HAF payments. If you need to establish a new authorized representative for HAF payments, please submit a request by email to HAF@treasury.gov.

Response: On November 22, 2021, following a request to haf@treasury.gov, Erica Boggess, Executive Director of the West Virginia Housing Development Fund (the "WVHDF") was assigned the role of Authorized Representative as well as Account Administrator and Point of Contact for the HAF Program. Email confirmation from haf@treasury.gov attached.

Homeowner Needs and Community Engagement

Data

- No questions.

Community Engagement and Public Participation

- Your plan did not indicate that any of the organizations involved in your public input process primarily address housing discrimination. Is this accurate? If so, please explain how the program is confident in its ability to reach targeted populations without engaging such organizations in planning and implementation.

Response: In the planning and implementation phase of the WV HAF program, the WVHDF provided draft plan information to 166 housing, nonprofit organizations, or other interested parties across the State. Although addressing housing discrimination may not be their primary function, many if not all are equal housing opportunity housing providers. Furthermore, the WVHDF intends to conduct outreach efforts to organizations with programs or initiatives to address discrimination as well as community organizations to help inform these populations about the program.

It should be noted that WV lacks diversity. An August 2021 report by US News and World Report ranks WV as the 2nd least diverse state in the country. Recent census data indicates that 93.1% of WV's population identifies as white, followed by 3.7% African American with the remaining percentage spread across other ethnic groups. This information was taken into consideration when developing the WV program as noted in several of the following responses. (Exhibit 1)

- Please describe any coordination you intend with Tribes or Tribal entities.

Response: There are no recognized Tribes or Tribal entities in WV. Per the census data, only .2% of WV identifies as Native American Indian or Native Alaskan.

- Please provide an update indicating any public comments you have received since you submitted your HAF Plan, from which organization you received any such comment, and whether you have responded to the comments.

Response: WV has not received any formal comments from the public since submission of the HAF plan. The WVHDF has received inquiries regarding when the program will be available through both social media and phone calls to our office. We are informing the public through our website and social media when we expect the program to open in the first quarter of 2022. We have also received several informal questions from our housing partners about the program guidelines that we have answered. We remain open to any idea or suggestion to improve the program.

Ongoing Assessment of Homeowner Need

- No questions.

Program Design

- Please explain how the sources of data listed in the section on Homeowner Needs informed the Program Design Elements included in your plan.

Response: The data sources made two things clear. One, there is a significant amount of mortgage delinquency in our market. Two, our program funding cannot satisfy the demand. WV has the highest percentage of homeownership in the country yet was allocated only the small state minimum of \$50 million under the HAF program. Providing funding assistance to the greatest number of households most in need played a significant role in the design of the WVHDF HAF plan. This is in addition to the consideration of State diversity demographics.

The WVHDF is the largest loan servicer in the State servicing \$873 million in single family mortgage loans. Most of these loans are mortgage revenue bond loans which programmatically meet the HAF eligibility requirements. Additionally, data was provided from other loan servicing organizations related to their WV portfolios. Data from both sources was used to determine average monthly PITI payments, average reinstatement amounts and other information to develop the program design elements.

- Will there be a method in your HAF program, early in the process of engaging with a household, to evaluate immediate threats to the housing stability of applicants, which may need to be addressed under an expedited or prioritized timeline (e.g. HOA liens, tax delinquencies, utility shut off)?

Response: Due to the limited funding allocated to WV, the HAF plan will focus on only those households most threatened. Mortgage assistance will be limited to those 90 days or more past due. Additionally, taxes, insurance, HOA and condo fees as well as utilities must be in a delinquent status to receive assistance. With the high number of homeowners in the State, funding will be dedicated to those with immediate threat of foreclosure, loss of utilities or threats related to tax liens, etc.

A determination of eligibility for all requests for assistance will be made as expeditiously as possible. The process required to evaluate immediate threat requests for assistance can undermine the overall efficiency and effectiveness of the program as well as increase program expenses. Therefore, it was determined a process to expedite select applications would not be established.

- Please describe how your program will utilize housing counselors or legal services to assist homeowners in evaluating loss mitigation options available for their mortgage. Your description should include:
 - whether your program will connect homeowners with housing counseling or legal services early in the process.
 - the role housing counseling or legal services providers will play in supporting homeowners' efforts at engaging in loss mitigation.

Response: Housing counselors and legal services will be secondary support services offered to applicants according to a needs-based screening and through general referral on both the application portal and the WVHDF website. This method is expected to mitigate inundating these entities as well as provide a better quality of service to referred applicants. Upon referral these entities will work with applicants with the goal of informing and supporting the applicant so they can make the best decision available to them. This will include exploring loss mitigation options offered by their mortgage servicer in pursuit of a sustainable mortgage payment.

This process, in addition to the program requirement that eligible applicants be 90-days or more past due, leverages loss mitigation and reduces the possibility of the duplication of benefits with loss mitigation.

- How will your program leverage resources available through a loss mitigation process to benefit homeowners and how will your program avoid using HAF funds in ways that duplicate relief that available loss mitigation options might provide?

Response: To provide limited funds to those most in need, the WVHDF HAF plan requires eligible applicants to be 90-days or more past due. Additionally, the need to assist seriously delinquent mortgages is urgent which supports the expedited distribution of the assistance by not waiting for mortgage servicers. The more applicants the program can assist without delay will hopefully afford mortgage servicers with increased capacity to assist others in our state. The HAF application portal will include questions to determine if the applicant has contacted their loan servicer for loss mitigation options. The WVHDF website will also include information encouraging homeowners to contact their loan servicers.

- The Mortgage Reinstatement, Mortgage Payment, and DPA Mortgage assistance programs contain a requirement that homeowners attest and provide documents showing they have the “ability to resume payments” after assistance. Please describe how West Virginia will determine sustainability, including any formula or ratio that you will use, and what specific documentation the homeowner will have to provide. Will homeowners who cannot document the ability to resume payments be referred to housing counselors for assistance with loss mitigation or other financial counseling?

Response: An assessment of loan sustainability will be completed based the application information and an estimated front-end DTI ratio. This in addition to an applicant attestation will be used to substantiate loan sustainability. When it is determined an applicant lacks loan sustainability, a housing counseling agency referral will take place.

- Are you anticipating increased winter home energy costs and their potential impact on the homeowners that HAF will serve?

Response: Home energy costs are always higher in winter months and energy costs are rising in general. The WVHDF HAF program will provide a maximum of \$2500 per household toward delinquent home energy, water, and wastewater utilities. This amount was determined through an analysis of the utility costs paid under the ERA program and then increased by a factor of .75 to account for higher utility costs for a home vs. a smaller rental unit. (Exhibit 2) This average, as adjusted is \$735. However, as evidenced in the ERA, some delinquencies can be much higher. However, U.S. Treasury HAF guidance stated that program design should leverage utility assistance from other federal programs specifically created for this purpose. The WVHDF will provide links and information on other utility program providers on its website and through social media. Following program launch, if program performance data reveals this amount is insufficient, an adjustment will be made.

- Your Mortgage Reinstatement and Mortgage Payment assistance programs set \$15,000 as the maximum amount of combined assistance per homeowner. Please explain how you determined this amount will be sufficient to resolve housing-related delinquencies and whether the cap will be sufficient in areas with higher housing costs?

Response: The WVHDF is the largest loan servicer in WV. WVHDF services loans on behalf of Fannie Mae as well as a large portfolio of mortgage revenue bond loans. Mortgage revenue bond loans represent low and moderate-income borrowers falling below the 150% AMI HAF program income limit. The WVHDF also solicited information from other loan servicing organizations with large WV loan portfolios. Using data from the WVHDF portfolio as well as information provided by the other loan servicing organizations, the average monthly loan payment is estimated at \$910. (Exhibit 3). It should be noted that housing costs in WV are relatively low compared to the country. The WVHDF average mortgage revenue bond loan house price is \$131,615.

“CHARLESTON, W.Va (WDTV) - West Virginia has the cheapest housing market in the U.S., according to a new study by The Ascent. The average home value in West Virginia is \$107,064 (the lowest in the nation), making W.Va. the most affordable state to buy a house, according to the study. Sept 23, 2020”

<https://www.wdtv.com/2020/09/23/study-wva-has-the-cheapest-housing-market-in-county/>

Information from the WVHDF portfolio and the information from the other servicing organizations indicated approximately 2151 delinquent loans in the State with a reinstatement average of \$9,189. (Exhibit 4)

During a December 1, 2021 working call, Wells Fargo reported approximately 503 WV loans 90+ days delinquent. This group of loans has an average PITI of \$856 and average reinstatement of \$12,000, further substantiating the estimates used to set the WVHDF program maximum.

Based on this assessment and the limited funds available for the program, \$15,000 should be sufficient to meet the needs of most eligible low- and moderate-income households. However, if program performance data reveals this amount is insufficient, an adjustment will be made.

Eligibility

- The Mortgage Reinstatement, Mortgage Payment, and DPA Mortgage assistance programs are limited to borrowers who are 90 days or more delinquent. Can you explain the rationale for this eligibility restriction?

Response: Given the demand for mortgage assistance and to aid those most threatened by foreclosure, the program was designed to assist those 90 days or more delinquent. This will improve the program's effectiveness and efficiency. Additionally, it best supports mortgage servicers doing their part to address the problem.

Housing counseling will be utilized for ineligible applicants and assisted applicants with a non-sustainable mortgage payment. Ineligible applicants will be referred directly to housing counseling. Assisted applicants with a non-sustainable mortgage payment may be referred to housing counseling post the delivery of the reinstatement assistance and/or during delivery of the monthly mortgage assistance.

- For homeowners receiving assistance through the Mortgage Reinstatement and Mortgage Payment assistance programs, will reinstatement assistance be applied before the housing payment assistance or after? Please describe how this combined assistance will be structured.

Response: Mortgage reinstatement will be applied first. If this satisfies the mortgage delinquency and the borrower attests that they will be able to remain current going forward, the borrower may not receive mortgage payment assistance. If, however, the borrower needs continued assistance, monthly payments will be provided until the \$15,000 maximum is reached.

Outreach

- Please explain how the program will target outreach and provide access to homeowners with limited English proficiency.

Response: As noted earlier, WV lacks diversity and does not have a large population of those with limited English proficiency. A review of the HUD Housing Counseling data provided supports the fact there is limited diversity in the state. (Exhibit 5) The WVHDF will provide both its on-line and mobile application in Spanish. It will also look to community and faith-based organizations that provide services to the Spanish speaking community and provide program information. The WVHDF expects its outreach to these communities will be focused on a grassroots outreach rather than tv or radio advertising. The WVHDF is also exploring texting services that can target outreach to specific demographics to further reach this market as well as other SDI groups.

- Please explain how the program will provide culturally relevant marketing.

Response: The WVHDF expects outreach to be through grassroots organizations.

Prioritization

If your program intends to serve households who are over the 100% AMI threshold, how will your program prioritize Socially Disadvantaged Individuals? Please describe your marketing and outreach strategy to SDI communities.

Socially disadvantaged individuals are those whose ability to purchase or own a home has been impaired due to diminished access to credit on reasonable terms as compared to others in comparable economic circumstances, based on disparities in homeownership rates in a HAF participant's jurisdiction as documented by the U.S. Census. The impairment must stem from circumstances beyond their control. The WVHDF HAF program will consider the following as socially disadvantaged individuals:

- Member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American Society
- Residents of majority-minority Census tract
- Individuals with limited English proficiency
- Individuals who live in persistent poverty counties as defined in the HAF guidance

- The WVHDF will provide grassroots outreach to community organizations, including housing providers, churches, and social organizations to provide information about the program and encourage participation. The WVHDF will also provide direct mail and/or text messaging to those in its loan servicing portfolio that may be eligible for the program. Monthly data will be evaluated to determine participation of socially disadvantaged individuals and adjustments to outreach will be made accordingly.

Performance Goals

- Please explain how you intend to communicate your progress towards performance to the public.

Response: The WVHDF will develop a public facing dashboard reporting on the number of households and level of assistance provided for transparency and to encourage applicants that, in fact, the program is helping.

- Please indicate which three metrics will serve as the best indicators of the success of your program.

Response: The best indicators will be the number of households assisted, the total amount of assistance, and the types provided, i.e., mortgage assistance, taxes, utilities, etc. This information will illustrate the types of assistance available and therefore inform the public about what they may be able to receive.

- Please indicate whether you intend to disaggregate metrics by income, race, gender, etc.

Response: The WVHDF portal will collect information on income, race, ethnicity, gender and limited English proficiency and may be used for reporting purposes. The portal will not require information on gender, race, ethnicity and English proficiency but will encourage participation to provide this data. Income, to the extent not determined by proxy, may be used to determine income for reporting purposes.

- Please consider including as an additional metric the number of homeowners assisted/foreclosures prevented solely through counseling or legal services without payment of HAF funds to resolve the homeowner's defaults or delinquencies.

Response: The WVHDF will consider capturing this information to the extent possible. The WVHDF intends to contract with HUD approved counseling agencies to provide counseling services and will obtain metrics on services performed, including if the counseled person or household has also received HAF assistance. However, it may be logistically difficult to determine with certainty that a household that received counseling did not receive assistance to resolve defaults.

- Your goals listed in the “Performance Goals” chart appear to be limited to the first six months of the program. Can you update this chart to include performance goals for the duration of the HAF program?

Response: WV was not a hardest hit state and therefore has no historical program information it can use to determine how many applications it will receive over time, nor does it have any historical data to determine how long it will take to move an application through the process particularly as it relates to working with loan servicing organizations that will be working with thousands or perhaps millions of loans. Without any historical background, it is extremely difficult to project longer term activity. Ultimately, our desire is to deploy the entire HAF award to assist WV homeowners. Our initial thinking was to assess the program at the six-month mark and adjust as necessary to determine if assistance maximums are meeting needs, if additional staffing resources will be needed, or if policies need adjusted to improve efficiencies. The WVHDF has made its best effort to project goals past the six-month mark and updated these goals in the Treasury portal.

Readiness

- Please provide the most recent available information about your program's readiness, including staffing, contractors, etc.

Response: The WVHDF has contracted with Witt O'Briens to aid in program development based on their Hardest Hit experience as well as assistance with application processing. The WVHDF has hired a full-time employee to liaison with Witt O'Briens and the participating loan servicing organizations and is in the process of hiring additional full-time staff. The WVHDF also has temporary personnel staffing its phone system to assist ERA applicants. The WVHDF has contracted with a software provider to develop its application portal.

- Is your program prepared to launch upon approval and, if not, by what date will you be ready to launch following approval?

Response: The WVHDF is targeting launch for the first quarter 2022.

- Please provide updated information about your progress in spending the initial 10% payment from your jurisdiction's full allocation and the status of any pilot assistance already offered or made available to homeowners.

Response: WV was not a hardest hit state and has no application infrastructure to open a pilot program until its HAF application portal is developed. The WVHDF will open its application portal under a “pilot” program to mortgagees in its mortgage revenue bond program approximately two to four weeks before a state-wide launch of the program. Expenditures to date are related solely to administrative costs to develop the program.

Budget

- Your administrative budget includes costs of \$3,750,000 under the category of “Program Assistance Contractor”. Please specify what these costs are inclusive of.

Response: Witt O'Briens is the program assistance contractor assisting with program development and application processing. It is anticipated that they will process most of the applications.

- Your administrative budget includes costs of \$251,000 under the category of "Miscellaneous". Please provide some examples as to what these costs are inclusive of.

Response: The miscellaneous category will cover any unanticipated or underestimated expenses of operating the HAF or program admin costs related to staff training, partner training, and temporary personnel costs. This budget line item has been updated to identify its purpose more clearly. All actual admin costs allocated to the HAF program will be eligible expenses.

From: COVIDReliefITSupport@treasury.gov
To: [Erica Boggess](#)
Subject: [SPAM] RE: [Sender_Unverified] Authorized Representative
Date: Monday, November 22, 2021 10:48:36 AM

Good Morning,

We have assigned you the following HAF Roles, Account Admin, Point of Contact, and Authorized Representative. If you have any further questions please let us know.

Best, COVID IT Relief Support

----- Original Message -----

From: Erica Boggess [eboggess@wvhdf.com]
Sent: 11/22/2021 8:14 AM
To: haf@treasury.gov
Cc: ann.v.urling@wv.gov; mary.m.lipford@wv.gov
Subject: [Sender_Unverified] Authorized Representative

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

The West Virginia Housing Development Fund is administering the HAF program on behalf of the State of West Virginia under the attached agreement. Accordingly, I submitted the HAF plan to Treasury. Subsequently, we received the following message in the Treasury Feedback for Resubmission of Plan:

- Your plan lists Erica Boggess as the Authorized Official, while the original application for HAF payments was signed by Governor James Justice. To ensure prompt payment upon approval, the Authorized Official needs to be the same as the signatory on the original application for HAF payments. If you need to establish a new authorized representative for HAF payments, please submit a request by email to HAF@treasury.gov.

I am hereby requesting that as Executive Director of the Housing Development Fund, that I be established as the authorized representative for the State of West Virginia. Please advise if you need anything additional. Thank you.

Erica L. Boggess, CPA

Executive Director

West Virginia Housing Development Fund

5710 MacCorkle Ave SE

Charleston, WV 25304

p. 304-391-8638 | c. 304-541-1740 | f.304-391-8761

eboggess@wvhdf.com | <https://hyperlink.services.treasury.gov/agency.do?origin=www.wvhdf.com>

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Exhibit 1
West Virginia Ethnicity by County

County	% White	% Hispanic Latino	% American			% Asian	% Pacific Islander
			% Black African American	Indian Native Alaskan			
Barbour County	95.8	0.9	0.9	0.3	0.8	0	
Berkeley County	86.8	4.4	7.8	0.1	1.1	0	
Boone County	98	0.4	1	0	0.1	0	
Braxton County	96.9	0.2	0.7	0.3	0	0.1	
Brooke County	96.3	0.9	1.7	0.1	0.5	0.2	
Cabell County	90.6	1.4	4.9	0.2	1.4	0	
Calhoun County	99	1.9	0	0.3	0	0	
Clay County	99.4	0.2	0	0.1	0	0.1	
Doddridge County	95.5	0.6	1.6	0.5	0.5	0	
Fayette County	93.5	1.2	5.2	0.3	0.1	0.1	
Gilmer County	83.2	4.1	12	0.2	0.9	0	
Grant County	97	0.7	1.6	0	0.2	0.2	
Greenbrier County	93.9	2	2.8	0	0.6	0	
Hampshire County	97.1	1.5	1.1	0.3	0.4	0	
Hancock County	95	1.6	2	0	0.5	0	
Hardy County	91.4	1.6	5.6	0.6	1.6	0	
Harrison County	95.3	1.7	1.6	0	0.6	0	
Jackson County	97.6	0.7	0.4	0.8	0.3	0	
Jefferson County	87.2	5.7	6.2	0.3	1.4	0	
Kanawha County	88.5	1.1	7.2	0.2	1.2	0	
Lewis County	97.4	1.2	0.2	0.5	0.5	0	
Lincoln County	98.3	0.7	0.2	0	0.1	0.1	
Logan County	96.7	0.9	1.8	0.2	0.1	0	
Marion County	89.1	1.5	8.3	0.3	0.1	0	
Marshall County	93.6	1.3	3.5	0.4	0.5	0	
Mason County	97.5	1	0.9	0.1	0.3	0.3	
McDowell County	97.3	0.7	0.4	0.1	0.6	0	
Mercer County	91.2	1.2	6.4	0.2	0.6	0	
Mineral County	94.8	0.9	3.4	0	0.4	0	
Mingo County	95.8	0	2.3	0.1	0.1	0	
Monongalia County	89.5	2.1	3.6	0.1	3.5	0	
Monroe County	97.2	0.9	0.9	0.5	0	0	
Morgan County	95.5	0.4	1.1	0.7	0	0	
Nicholas County	97.1	0.8	0.9	0.4	0.2	0	
Ohio County	92.9	1.2	3.9	0.2	0.7	0	
Pendleton County	95.5	0.8	3.3	0.1	0	0	
Pleasants County	96.2	2.9	0.3	0	0	0	
Pocahontas County	98.6	0.6	0.4	0	0.1	0	
Preston County	92.2	2.5	5.1	0.7	0.3	0	
Putnam County	96.4	1.2	1.4	0.1	0.8	0.1	
Raleigh County	88.1	1.6	7.7	0.3	1	0	
Randolph County	96.4	1	2.1	0.2	0.6	0	
Ritchie County	97.4	0.7	0.3	0	0	0	
Roane County	97.9	1.1	0.1	0.1	0.2	0	
Summers County	93.1	1.5	4.6	0	0	0	
Taylor County	96.3	1	1.3	0	0.3	0	
Tucker County	97.4	0.3	0.5	0	0.5	0	
Tyler County	97.6	0.4	0.4	0.2	0.7	0	
Upshur County	96.9	1.4	2	0.1	0.2	0	
Wayne County	97.6	0.7	0.9	0.2	0.3	0	
Webster County	99.6	0.1	0	0	0	0	
Wetzel County	97.8	0.9	1.1	0	0	0	
Wirt County	99.4	0.5	0.4	0	0	0	
Wood County	96.2	1.2	1.4	0.4	0.5	0.1	
Wyoming County	97.3	0.3	1.2	0	0.3	0	
West Virginia	93.1	1.6	3.7	0.2	0.8	0	
Total Non-white						6.3	

Source: American Community Survey

Exhibit 2
MRAP Avg Utilities

	Amount of Assist	#Paid	Average
Water	\$ 193,827	780	\$ 248
Electric	\$ 1,025,471	1848	\$ 555
Gas	\$ 166,328	526	\$ 316
Mass Fuel	\$ 536	1	\$ 536
Sewer	\$ 59,382	287	\$ 207
Total	<u>\$ 1,445,543</u>	<u>3442</u>	\$ 420
Increase for Residential - HAF		1.75	\$ 735

Exhibit 3

Average PITI

Servicer	Investor	Monthly Payment Amount (average PITIA) (1)
BBT	Fannie	\$ 1,284.72
BBT	Freddie	\$ 1,006.93
BBT	Private	\$ 867.02
BBT	USDA	\$ 691.94
Carrington	Fannie	\$ 621.58
Carrington	FHA	\$ 625.44
Carrington	Freddie	\$ 806.63
Carrington	Private	\$ 555.55
Carrington	USDA	\$ 592.39
Carrington	VA	\$ 728.62
Freedom	Fannie	\$ 1,409.67
Freedom	FHA	\$ 1,085.34
Freedom	Freddie	\$ 1,422.90
Freedom	Private	\$ 936.36
Freedom	USDA	\$ 998.92
Freedom	VA	\$ 1,191.33
MRC	Fannie	\$ 866.15
MRC	FHA	\$ 976.11
MRC	Freddie	\$ 1,155.67
MRC	Private	\$ 847.34
MRC	USDA	\$ 910.47
MRC	VA	\$ 1,190.19
SunTrust	Fannie	\$ 955.12
SunTrust	FHA	\$ 817.67
SunTrust	Freddie	\$ 832.87
SunTrust	Private	\$ 558.54
SunTrust	USDA	\$ 833.43
SunTrust	VA	\$ 839.41
WVHDF	Bond and MU Loans	\$ 672.76
		\$ 906.24
	Rounded Average Monthly PITI	\$ 910.00

Exhibit 4
Average Reinstatement & Delinquent Loans

Servicer	Investor	\$ Reinstatement (average)
BBT	Fannie	\$ 14,398.96
BBT	FHA	\$ -
BBT	Freddie	\$ 11,232.42
BBT	Private	\$ 8,475.73
BBT	USDA	\$ 7,433.02
BBT	VA	\$ -
MRC	Fannie	\$ 11,132.42
MRC	FHA	\$ 9,991.32
MRC	Freddie	\$ 13,564.77
MRC	Private	\$ 15,960.18
MRC	USDA	\$ 10,302.79
MRC	VA	\$ 14,285.47
SunTrust(HST)	Fannie	\$ 10,766.94
SunTrust(HST)	FHA	\$ 8,611.05
SunTrust(HST)	Freddie	\$ 9,239.91
SunTrust(HST)	Private	\$ 6,562.02
SunTrust(HST)	USDA	\$ 8,165.74
SunTrust(HST)	VA	\$ 10,780.72
WVHDF	FHA	\$ 7,256.72
WVHDF	VA	\$ 8,624.53
WVHDF	Private	\$ 5,243.37
WVHDF	USDA	\$ 7,420.45
WVHDF	Fannie	\$ 11,900.00

Number of Delinquent Loans

Freedom	359
BB&T	209
Carington	353
HST	117
MCR	770
WVHDF	<u>343</u>
	<u>2151</u>

Average Reinstatement	\$	9,189.07
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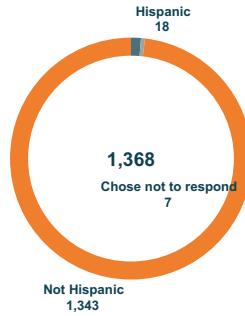
Exhibit 5 Race and Ethnicity

Ethnicity of Household

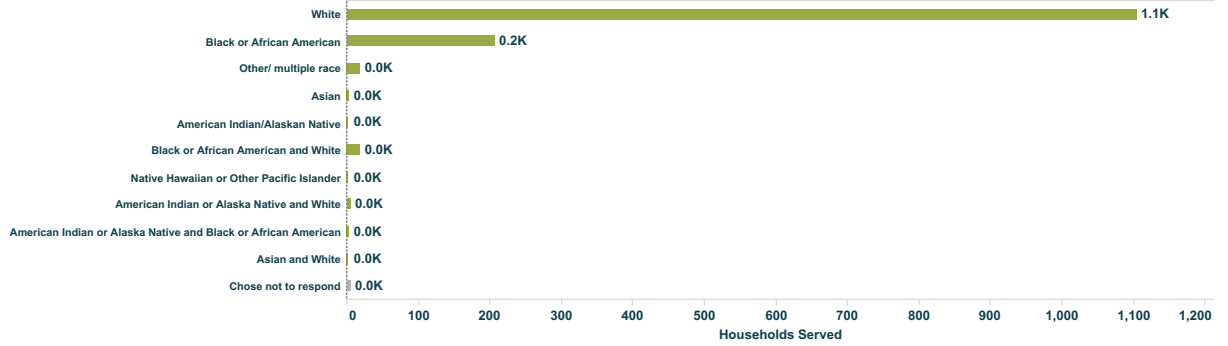
State
WV

Fiscal Quarter
FY 2021 Q3

Display As
 Total
 Percent



Race of Household



Please Note: Data displayed on this page is populated by agency-level data submitted through HUD's Housing Counseling System (HCS) as part of HUD's 9902 reporting process. Quarter 3 FY 2021 data is the latest data displayed on this page. HUD Form-9902 data is cumulative - additional data will be submitted over the course of FY 2021.