

U.S. VIRGIN ISLANDS
2015-2019 CONSOLIDATED PLAN
FOR HOUSING & COMMUNITY DEVELOPMENT



2015- 2016 PROGRAM YEAR ACTION PLAN

REVIEW DRAFT JULY 2015

Submitted by:
Virgin Islands Housing Finance Authority

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EXECUTIVE SUMMARY

PURPOSE OF THE CONSOLIDATED PLAN

The Consolidated Plan establishes local priorities consistent with national objectives and priorities established by HUD (US Department of Housing and Urban Development) to utilize funds allocated by the Community Development Block Grant (CDBG), the HOME Investment Partnership Program, and the Emergency Solution Grant (ESG). If funding levels remain constant, over \$13 million in grant allocations will be available to the U.S. Virgin Islands over the five-year period covered by the Consolidated Plan.

CDBG Program Objectives	HOME Program Objectives	Emergency Solutions Grant
Provide decent housing Create a suitable living environment Expand economic opportunities	Expand the supply of decent, safe, sanitary and affordable housing	Reduce and prevent homelessness

SUMMARY OF NEEDS AND GOALS

Summary of Objectives and Outcomes (ES05)

Priority needs and corresponding goals were established after an assessment of needs and capacity, review of relevant economic information and statistical data, discussions in the community, consideration of strategic plans of partner agencies and providers in the region, and review of available planning documents. These will serve as the framework for setting actions during the five-year period covered by the Consolidated Plan.

Four priority needs were established, each a high priority:

- Affordable housing choice
- Homelessness services and facilities
- Public and community services
- Infrastructure, facilities and economic development

Four goals were established to meet the needs:

- Increase and preserve affordable housing units
- Reduce and prevent homelessness
- Provide services and community support
- Support community and economic development

Evaluation of Past Performance (ES05)

To be included in final document

Citizen Participation and Consultation

To be included in final document at end of outreach and comment period

PUBLIC PARTICIPATION AND CONSULTATION (PR10)

Agency Consultation and Coordination

Coordination with the Continuum of Care (PR10)

A full-time staff position at the VIHFA is responsible for implementation of the ESG Program and development of policies and procedures for reducing homelessness and increasing services for homeless persons and those at risk of becoming homeless. This position helps to improve coordination between the two major homeless planning and policy development organizations – the Interagency Council on Homelessness and the Continuum of Care. One of the current efforts is to obtain the participation of additional nonprofit organizations which have not previously been involved in the Continuum.

A major element of improving coordination on emergency housing issues resulted from the completion of a coordinated Emergency Housing Strategic Plan in 2014 and its implementation in 2014-2015. Included was the execution of Memoranda of Understanding among key agencies describing their respective roles and responsibilities. VIHFA has committed to make emergency housing available as a key component of coordinated referral system, improving transitions from homelessness to housing and services.

Coordination with Emergency Solutions Grant (PR10)

VIHFA is well-positioned to provide coordination of funding decisions and allocations. Continuum of Care representatives and VIHFA staff conduct an evaluation of ESG applications. An assessment of the performance of existing grantees is included as part of the evaluation.

Summary of Agency Consultation (PR10)

Development of the Consolidated Plan benefitted from input from multiple stakeholders who contributed through interviews and meetings, in addition to those who were represented at public hearings.

Agencies consulted include the following:

(Note: The following is a partial list which will be updated at end of public participation process.)

- Virgin Islands Housing Authority
- Virgin Islands Housing Finance Authority
- Virgin Islands Economic Development Authority
- Virgin Islands Continuum of Care on Homelessness
- Catholic Charities of the Virgin Islands

- University of the Virgin Islands
- Members of the real estate industry on St. Croix and St. Thomas
- St. Croix Foundation
- Methodist Training and Outreach Center
- Reaching Potentials
- Family Resource Center
- Women's Coalition
- Department of Planning and Natural Resources
- Virgin Islands Domestic Violence and Sexual Assault Council

Agencies not Consulted (PR10)

No agencies were intentionally excluded from consultation. Every effort was made to ensure advance publication of meetings and opportunities to contribute. In addition, agencies and the general public were invited to express their concerns via a *Housing and Community Development Needs Survey*. Results of that survey and comments have been incorporated in statements of needs and opportunities throughout this Consolidated Plan.

Citizen Participation (PR15)

There was a concerted effort to consult with citizens, service recipients, social service agencies, community-based organizations, and others who could inform the plan and outline needs in the Territory. A survey was utilized at public gatherings and with agency providers to enhance response and participation.

ASSESSMENT OF NEEDS

BACKGROUND

Social and Political History

The Virgin Islands has for a long time been regarded as the hub of sea routes on the way to the rest of the world. Due to this central location, the Islands had a substantial colonial history. Several European powers held control of all or a portion at one point or another, as it was a base for protecting ships entering the New World. Denmark held the longest continuous control over the islands with at first partial and later complete ownership. As early as 1867, the islands of St. Thomas and St. John requested transfer to the United States. In the early 1900s, the United States began to look for ways to protect the Panama Canal and viewed the islands as important to that defense. In 1917 all three Danish West India Islands were purchased for \$25 million by the United States of America.

Thirty-seven years later, the United States Congress instituted the Organic Act of 1954, providing for a Virgin Islands central government, while still allowing a degree of self-government. Executive, legislative and judicial branches of government were then established in Charlotte Amalie. Subsequently Congress allowed for an elected governor and lieutenant governor, each for four-year terms, and an elected delegate to the United States House of Representatives.

Along with these changes in political climate came changes in the economy. St. John and St. Thomas depended primarily on tourism and St. Croix mainly on oil and bauxite refining. Because of relatively easy access to the United States mainland, there is considerable movement between the Virgin Islands and the mainland. With changing opportunities for employment and a better standard of living, there is also movement to the Virgin Islands from neighboring Eastern Caribbean islands, the Dominican Republic, and Puerto Rico.

Overview of Methodology and Needs

While there are clear and pressing needs on each of the Virgin Islands, standardized data are lacking. The American Community Survey (ACS) is not being conducted by the Census Bureau because of the lack of clear street names and house numbers. Therefore, standard presentation of data utilizing the ACS is absent in the Integrated Disbursement and Information System (IDIS), leaving the Virgin Islands to base needs on local input and data. Fortunately, the 2010 decennial census sampled the population with the detailed long-form survey. Importantly, the University of the Virgin Islands (Eastern Caribbean Center) has regularly conducted an annual Community Survey. Data from this survey can be analyzed at the level of the “estates,” which are locally-recognized and identifiable geographic subunits, smaller than block groups.

Consultation revealed a pressing need for services and housing for the lowest income populations, for persons who are homeless, and for persons with other special needs. There is a clear lack of shelter, transitional housing, and permanent supportive housing. Untreated mental illness is a primary contributor to homelessness and is a priority need. This was affirmed repeatedly throughout the consultation process.

At the same time there are needs for housing and homeless and other services, there is a need for economic and community development and for support for infrastructure and facilities. The closure of the HOVENSA oil refinery on St. Croix (idle since 2012) removes an important industry. Many displaced workers and their families are leaving for mainland jobs or opportunities. Others are competing for scarce jobs, especially those that pay a living wage. The closure leaves a significant gap in support for the economy of the entire Virgin Islands. In addition to jobs and taxes, the closure may impact the cost of utilities and gasoline since fuels must now be imported.

DEMOGRAPHICS

Population

Table 1: Population 1990-2012 Virgin Islands

Location	1990	2000	2010	2012
St. Croix	50,139	53,234	50,601	50,225
St. John	3,504	4,197	4,170	4,039
St. Thomas	48,166	51,181	51,634	50,816
Virgin Islands	101,809	108,612	106,405	105,080

Source: U.S. Census; 2012 VI Community Survey

The Virgin Islands has seen a decline in population – a 5% decline between 2000 and 2010 and an additional loss by the 2012 Virgin Islands Community Survey. It is expected that the Community Survey will show a continued decline in the next two to three years as the population adjusts to loss of employment, particularly in St. Croix.

Table 2: Population Age 2010

Age Range	St. Croix	St. John	St. Thomas	Virgin Islands
Under 20	30%	22%	26%	28%
20 to 44	28%	33%	32%	30%
45 to 64	27%	34%	29%	28%
65 and older	14%	12%	13%	14%
Median age	38.2	41.9	39.8	39.2

Source: U.S. Census

Overall the population in the Virgin Islands is older than the United States (median age of 39.2 in the Virgin Islands in 2010 compared to 37.2 in the United States as a whole). The median age in St. John is particularly notable at 41.9. St. Croix had a slightly younger population, as measured by the median age,

with 30% of the population under the age of 20. The 2012 Community Survey showed median ages had increased to 39.7 for the Virgin Islands overall. A continued out-migration of workers because of the changing economics in the Virgin Islands may mean a weaker system of family and community care for those most in need, such as the elderly, persons with mental illness and other vulnerable populations.

Population 65 and Older

A growing elderly population requires planning for housing, transportation and services. Older residents are more likely to be isolated or homebound and in need of additional support to live safely in their homes, whether owned or rented. Life expectance has not been historically equal for men and women. Looking at 2010 census data for the Virgin Islands, the median age for men was 38.5 and for women 39.7. The gap in longevity is decreasing nationally. With the aging of the “baby boomers” (those born between 1946 and 1964) the impact of an increasingly older and potentially feebler population may be substantial.

Table 3: Virgin Islands Population 65 and Over by Gender and Age 2010

Age Range	Total 2010 Population	Percent Men	Percent Women
65 to 69	5,854	49%	51%
70 to 74	3,717	47%	53%
75 to 79	2,326	45%	55%
80 to 84	1,332	43%	57%
85 and older	1,159	33%	67%

Source: U.S. Census

Race and Ethnicity

Table 4: Race and Ethnicity 2010

Race*	St. Croix	St. John	St. Thomas	Virgin Islands
Black/African American	74%	57%	80%	76%
White	14%	38%	15%	16%
Other	12%	5%	5%	8%
Ethnicity**				
Hispanic	24%	10%	11%	17%
Non-Hispanic	76%	90%	89%	83%

*Race alone: may be Hispanic

**May be of any race

Source: U.S. Census

The population of the Virgin Islands is predominantly (74%) Black or African American. In terms of ethnicity, 17% of the population is of Hispanic or Latino origin, most of who originated in Puerto Rico or the Dominican Republic (59% Puerto Rican and 31% Dominican).

A multinational population is an asset in any community, as is a richly diverse population; however, the inability to communicate in English can isolate individuals and families from their neighbors and from the larger community. Whether new to the area or longer-term residents, people with limited English

language skills may face barriers in accessing services and understanding important life transactions. This includes comprehending legal rights, understanding how to qualify for and buy a home, responding to discrimination in housing, communicating with healthcare professionals, and performing routine day-to-day activities without effort. Stakeholders contributing to this Consolidated Plan reported that inability to speak English is a barrier to getting housing and services. As of the 2010 census, 9% of the population of the Virgin Islands (age 5 and older) spoke English less than “very well.” Most of those without strong English skills were speaking Spanish and Spanish Creole, or French and French Creole.

About one-third of the populations was foreign-born (2010 census), mostly from other Caribbean islands. While most people are citizens, 12% reported not being so. Uncertain immigration status, even among persons with children born in the United States, is a problem for many people who may have reduced access to resources and housing and face discrimination in housing, even though it is illegal to do so. Depressed economies in the Caribbean means people will look for better opportunities for employment elsewhere, including the Virgin Islands.

Disproportionate Concentrations of Minority Populations (NA30)

Evaluate with 2010 census and 2012 Community Survey maps

Households

Table 5: Households 2010

Type of Household	St. Croix		St. John		St. Thomas		Virgin Islands	
	Number	%	Number	%	Number	%	Number	%
Total households	19,765		1,894		21,555		43,214	
Family households	12,641	64%	1,032	54%	12,564	58%	26,237	61%
With own children <18	5,841	30%	419	22%	5,450	25%	11,710	27%
Male householder*	1,129	6%	104	5%	1,406	7%	2,639	6%
With own children <18	501	3%	57	3%	651	3%	1,209	3%
Female householder*	4,839	24%	309	16%	4,798	22%	9,946	23%
With own children <18	2,927	15%	187	10%	2,553	12%	5,667	13%
Nonfamily households	7,124	36%	862	46%	8,991	42%	16,977	39%
Householder living alone	6,280	32%	678	36%	7,701	36%	14,659	34%
Male	3,270	17%	349	18%	3,860	18%	7,479	17%
65 and older	819	4%	53	3%	801	4%	1,673	4%
Female	3,010	15%	329	17%	3,841	18%	7,180	17%
65 and older	1,196	6%	78	4%	1,300	6%	2,574	6%
Average household size	2.50		2.18		2.35		2.41	

Notes: All percentages shown are of total households.

*No spouse present

Source: U.S. Census

The majority of households in the Territory are family households (61% of all households) but there are dissimilarities between the islands. On St. Croix, 64% of all households are family households, but on St. Thomas only 58% and St. John just 54%. Corresponding to the percent of family households is the percent of family households with children under the age of 18 – a larger percentage on St. Croix (30%) than St. John and St. Thomas (25% with children under 18).

Single parent households can be more vulnerable because of added responsibilities and lower household income. Of all family households in the Territory, 27% have their own children under the age of 18 living with them. Three percent of all households in the Territory consist of male householders (without spouse present) with their own children under the age of 18 and 13% of all households consist of female households (without spouse present) with their own children under the age of 18. (For comparison with U.S. data, 2% of all households consist of children living with single fathers and 7% of all households consist of children living with single mothers.)

The 2012 Community Survey (UVI, Eastern Caribbean Center, Table P1.2) provided estimates about the households in which children under the age of 18 were living. The largest percent of children in the Territory were living in households with their mothers – 45% of children under the age of 18 were living with their female parent only. Another 22% of all children under the age of 18 were living with their fathers (male parent only) and just 24% of all children were living in married couple families.

Nonfamily households consist of unrelated individuals. Roommates are nonfamily households as are same sex couples without related children or other related family members. Over one-third of households consist of people living alone (34% of all households in the Territory are single-person households). Ten percent of all households in the Territory consist of people 65 and older living alone, most of whom are female (61% are). This is comparable to data for the United States as a whole.

ECONOMY AND EMPLOYMENT

Introduction (MA45)

The United States Virgin Islands consists of four primary inhabited islands. Three of these islands (St. Thomas, St. John and Water Island) are clustered, and comprise a single geographic district. The largest island in this district (St. Thomas) is the center of the Territory's tourism industry, has a landmass of 32 square miles, and a population of 51,634 (in 2010). The island of St. John has a population of just 4,170 (also 2010 census data) and a land mass 19 square miles, two-thirds of which comprises the national park. The distances between the islands in this district vary from two miles between St. Thomas and St. John to less than a mile between St. Thomas and Water Island. Transportation between the islands in the district is by inter-island ferry.

The second district, 40 miles from the first, encompasses the fourth and largest island – St. Croix. This island has a landmass of 84 square miles, with a population of 50,601 in 2010, and has housed the Territory's manufacturing industry. The primary inter-island transportation is commercial aircraft. Inter-island ferry service is available on a seasonal basis.

The 2010 U.S. Census estimated the total resident civilian population age 16 and older employed in the Virgin Islands population at 49,588. Retail trade, construction, arts and entertainment, along with

education and health care were important on all islands. The islands have unique economic characteristics, however. St. Croix traditionally has had the largest manufacturing sector, although that has been largely decimated with the recent closure of the HOVENSA oil refinery. St. John and St. Thomas had larger segment of jobs focused on arts, entertainment and related services. Retail trade was accounted for a larger share of the jobs in St. Thomas.

Major Employment Sectors (MA45)

Table 6: Occupations of Employed Civilian Workforce 16+ 2010

Occupation	St. Croix		St. John		St. Thomas		Virgin Islands	
Civilian employed*	20,692	100%	2,446	100%	26,450	100%	49,588	100%
Management, business, science, arts	5,911	29%	548	22%	6,785	26%	13,244	27%
Service	4,728	23%	760	31%	6,753	26%	12,241	25%
Sales and office	4,797	23%	538	22%	7,207	27%	12,542	25%
Natural resources, construction**	2,907	14%	331	14%	3,090	12%	6,328	13%
Production, transportation***	2,349	11%	269	11%	2,615	10%	5,233	11%

*Civilian employed population age 16+

**Natural resources, construction and maintenance

***Production, transportation, material moving

Source: 2010 U.S. Census

Table 7: Industries of Employed Civilian Workforce 16+ 2010

Occupation	St. Croix		St. John		St. Thomas		Virgin Islands	
Civilian employed*	20,692	100%	2,466	100%	26,450	100%	49,588	100%
Agriculture, forestry, fishing/hunting, mining	163	1%	3	<1%	101	<1%	267	1%
Construction	2,000	10%	268	11%	2,239	8%	4,507	9%
Manufacturing	2,123	10%	36	1%	367	1%	2,526	5%
Wholesale trade	312	2%	20	1%	477	2%	809	2%
Retail trade	2,171	10%	233	9%	3,831	14%	6,235	13%
Transportation/warehousing/utilities	1,197	6%	240	10%	2,405	9%	3,842	8%
Information, finance/insurance, real estate	1,414	7%	250	10%	2,041	8%	3,705	7%
Professional services**	1,653	8%	203	8%	1,962	7%	3,818	8%
Education, health care, social assistance	3,843	19%	210	9%	4,014	15%	8,067	16%
Arts, entertainment***	2,387	12%	701	28%	4,697	18%	7,785	16%
Other services, public administration	3,429	17%	282	11%	4,316	16%	8,027	16%

*Civilian employed population age 16+

**Professional, scientific and management, and administrative and waste management services

***Arts, entertainment and recreation, and accommodation and food services

Source: 2010 U.S. Census

The closure of the HOVENSA oil refinery in St. Croix in 2012 had a major impact on employment and significantly reduced manufacturing as a share of jobs in the Virgin Islands – a 55% decline between 2012 and 2013 (*Economic Conditions*, U.S. Virgin Islands Bureau of Economic Research, January 2014). The loss reduced tax revenues and government spending and will continue to impact the economy as a whole for some time. High unemployment and increased demand for supportive services drains local resources. The Virgin Islands are also directly affected by poor economic conditions in the rest of the United States which impact trade, tourism and investment.

Rum production continues to be a significant contributor to manufacturing employment and revenue and has become the largest source of manufacturing jobs. Aggressive marketing and promotion of rum products are anticipated to increase employment further.

The U.S. Virgin Islands Bureau of Economic Research, in the 2013 *Annual Indicators*, estimates the total 2013 civilian labor force in the Virgin Islands at 47,558 individuals. Total civilian employment was estimated at 41,207 jobs (considerably lower than the 2010 census estimates), with an overall unemployment at 13.4% of the labor force. Somewhat more recent estimates of civilian employment compiled by the U.S. Virgin Islands Bureau of Labor Statistics, 2014 annual averages, place the number of civilian jobs overall at 40,720, with 22,260 on St. Thomas/St. John and 18,460 on St. Croix. These estimates indicate a continued trend of fewer jobs available.

Table 8: Non-Agricultural Wage and Salary Employment 2013

Sector	Jobs 2009	Jobs 2013	Average Annual Change*	
			5-Year	1-Year
Total non-agricultural wage & salary jobs	43,690	38,704	-2.8%	-4.4%
Private	30,680	27,681	-3.0%	-4.5%
Construction & mining	2,081	1,647	-6.9%	-5.3%
Manufacturing	2,192	672	-20.1%	-41.6%
Transportation, warehouse, utilities	1,577	1,494	-3.5%	0.9%
Wholesale & retail trade	6,825	6,755	-1.7%	-3.5%
Financial activities	2,458	2,236	-3.1%	-1.8%
Leisure & hospitality	6,952	7,247	0.1%	-0.6%
Information	777	769	-1.5%	-4.3%
Services**	9,120	9,082	-1.5%	-1.5%
Federal government	1,001	952	-0.8%	0.7%
Territorial government	12,009	10,071	-2.3%	-4.4%

*Average of annual changes over a 5-year period.

**Professional, business, education, health, and other

Source: U.S. Virgin Islands Annual Economic Indicators, Bureau of Economic Research

Comparing non-agricultural wage and salary jobs over the last five years (2009 to 2013), there has been a loss of jobs in virtually every sector, strongest in manufacturing and construction. There was a loss of 41.6% of manufacturing jobs in a single year (2012-2013), with an average annual change over a 5-year period of loss of 20.1% of jobs. Along with the decline in most private sectors, Territorial government employment and, to a lesser extent, federal employment has declined. Public sector jobs accounted for 30% of the total positions in 2009 and 28% of a declining number of jobs in 2013.

The largest employers as of the 4th quarter 2014 (U.S. Virgin Islands Labor Market Basket based on Quarterly Census of Employment & Wages Program) were in retail trade and industries related to leisure and hospitality.

Table 9: Largest Private Employers 2014

Company		Industry	Company		Industry
1	Kmart, Corporation	Retail trade	14	AT Construction Solutions	Construction
2	Ritz-Carlton Virgin Islands	Leisure/Hospitality	15	L.S. Holding	Retail trade
3	Plaza Extra Supermarket	Retail trade	16	First Bank Virgin Islands	Financial
4	INNOVATIVE Telephone	Utilities	17	Frenchman’s Cove	Leisure/Hospitality
5	Caneel Bay Resort	Leisure/Hospitality	18	Commercial Security Services	Services
6	Marriott HSFR*	Leisure/Hospitality	19	Ranger America of the VI	Services
7	Sugar Bay Club & Resort	Leisure/Hospitality	20	Jewelry Exchange	Retail trade
8	World Fresh Market	Retail trade	21	Banco Popular de Puerto Rico	Financial
9	Westin Resort St. John	Leisure/Hospitality	22	TOPA Equities VI	Services
10	HDVI Holding Co.**	Retail trade	23	Carambola Beach Resort	Leisure/Hospitality
11	Buccaneer Hotel	Leisure/Hospitality	24	Treasure Bay VI	Leisure/Hospitality
12	Cost-U-Less Corporation	Retail trade	25	The New 5-7-9 & Beyond	
13	Marriott HSFR II	Leisure/Hospitality	26	KAZI Foods of the VI	Retail trade

*Marriott Hotel Service Frenchman’s Reef

**Home Depot

Sources: U.S. Virgin Islands Labor Market Basket, Quarterly Census of Employment and Wages Program; Community Research Services, LLC, A Housing Demand Study for the Territory of the Virgin Islands, draft report April 2015

Commuting to Work

The average daily time commuting to work in the Virgin Islands is 21 minutes. The majority of the civilian labor force (58%) drives alone to work, but a substantial number carpool. While the commute distances in the Territory may be small, roads are often congested leading to delays. Continued residential development outside urban areas may lead to further congestion. The price of gasoline was favorable while the HOVENSA refinery was in operation. The price has increased and may continue to increase in the future. The cost of commuting to and from work has received increased attention in relation to housing cost. Money saved in housing is offset by the cost of commuting. While the pattern of sprawl seen in urban areas in the United States is not strictly applicable in the Territory, the cost of gasoline and the expenses associated with in owning and maintaining a vehicle can be considerable.

Table 10: Commuting to Work 2010

Commute Method	St. Croix	St. John	St. Thomas	Virgin Islands
Drive alone	67%	51%	52%	58%
Drive in carpool	20%	21%	24%	22%
Other method	13%	28%	24%	20%
Mean commute time (minutes)	19.8	17.5	22.6	21.1

*Civilian employed population age 16+

Source: U.S. Census

Unemployment

Unemployment is high in the Virgin Islands. According to data provided by the Bureau of Economic Research, the 2014 average unemployment rate in the U.S. Virgin Islands was 13.1, considerably higher in St. Croix (rate of 13.9) than St. Thomas/St. John (rate of 12.1). The average unemployment rate in the United States as a whole was 6.2 in 2014.

Table 11: Average Unemployment 2014

Location	2014
St. Thomas/St. John	12.1
St. Croix	13.9
U.S. Virgin Islands total	13.1

Source: U.S.V.I. Bureau of Economic Research

Official unemployment rates may underestimate the degree to which people are unemployed or underemployed. Adding discouraged workers who want to work but have given up looking because jobs are not available and people who are employed part-time but who would like to work full time yields a higher estimate of unemployment.

Using the Current Population Survey, the Bureau of Labor Statistics estimated the official unemployment rate in the United States to be 5.9 (2nd quarter 2014 through 1st quarter 2015) Adding discouraged and marginally employed workers, the rate is estimated at 11.6 (i.e., almost double the rate).

If the ratio of willing but discouraged or marginally employed workers was similar in the U.S. Virgin Islands, the unemployment rate would be about 26.0 (based on 2014 data). Even that higher rate does not consider people who are employed in occupations mismatched to their training or expertise.

Workforce Development

Educational Attainment

The level of educational attainment is lower in the Territory than in the United States as a whole. Just 69% of residents in 2010 had a high school diploma or higher level of education. For comparison, 86% of the population in the United States 25 and older had graduated high school (2013 5-year American Community Survey).

Table 12: Educational Attainment*

Educational Attainment	St. Croix	St. John	St. Thomas	Virgin Islands
Less than high school graduate	33%	23%	30%	31%
High school graduate (includes equivalency)	30%	25%	31%	31%
Some college or associate’s degree	19%	23%	19%	19%
Bachelor’s degree	11%	19%	12%	12%
Graduate or professional degree	7%	9%	7%	7%

*Population 25 and older

Source: 2010 U.S. Census

There is room for improvement and justification for efforts in the Territory to improve student attendance, academic performance and graduation.

- The Virgin Islands Department of Education reported that attendance for all students was at 82% for the 2013-2014 school year (NCLB Report Card).
- The graduation rate in the 2012-2013 school year was 62% (NCLB Report Card).

- The US Virgin Islands *Kids Count Data Book 2013* reports that since 1990, violent crime and death rates for juveniles and teens have risen and are considerably above national averages (270% higher violent crime rates and 100% higher death rates).
- Education matters – income increases with education and job preparation, including vocational training and associates degrees. Training for available positions is clearly a factor.

HOUSEHOLD INCOME

Measures of Income

Table 13: Measures of Income in Past 12 Months (2009)

Income Measures*	St. Croix	St. John	St. Thomas	Virgin Islands
Median household	\$36,042	\$40,644	\$38,232	\$37,254
Median family	\$41,959	\$50,592	\$47,122	\$45,058
Median earnings male full-time**	\$38,373	\$32,165	\$32,260	\$35,455
Median earnings male***	\$29,710	\$27,887	\$26,682	\$27,881
Median earnings female full-time**	\$30,759	\$30,266	\$29,701	\$30,219
Median earnings female***	\$22,651	\$22,491	\$22,838	\$22,740
Retirement income (mean)	\$24,549	\$24,796	\$26,176	\$25,350
Per capita	\$19,883	\$25,730	\$22,458	\$21,362

*Income in the last 12 months

**Assuming full-time, year-long work for population 16+

***Median income for population 16+ with earnings

Source: 2010 U.S. Census

The most recent 2012 Community Survey results (Eastern Caribbean Center, University of the Virgin Islands) shows lower levels of income, although not as dramatic a drop as might be expected given the closure of HOVENSA. The median household income for the Virgin Islands was \$36,674 and median family income was \$43,606. It is expected that income measures will decline further in data collected for 2013 and later years as severance pay and other forms of compensation are exhausted.

Wages in for jobs in the Virgin Islands are generally lower than comparable wages in the United States. In May 2014, the Bureau of Labor Statistics (bls.gov) estimated the mean hourly wage in the Virgin Islands at \$16.81 while the mean hourly wage in the United States was \$22.71.

Median earnings for males working full-time in the Virgin Islands in 2009 (2010 census) amounted to \$35,455 and for females working full-time \$30,219, about 15% lower than males. An important comparison with this, however, is the median earnings for all employment, not just full-time employment. In 2009, the median earnings for males was \$30,219 and for females \$22,740. The most recent 2012 Community Survey shows that in the Virgin Islands just 53% of all workers were full-time, with median earnings for all workers of \$27,510. Just 47% of females were working full-time and with median earnings for all female workers of \$23,940.

While it is difficult to capture the real-time economic picture, the 2009 and 2012 data show that:

- Household and family incomes and other income measures in the Virgin Islands are low compared to the United States as a whole. While measured a little differently, but as a reference, median household income in the United States in 2009 inflation-adjusted dollars was \$51,425 (compared to Virgin Islands median of \$37,254).
- Wages are typically low in the U.S. Virgin Islands which relies on strong tourism and retail sectors.
- Full-time, year-around work is not always available, in fact only 53% of males and 47% of females who were working had full-time employment (2012 Community Survey).

Table 14: Range of Household Income in Past 12 Months (2009)

Range*	St. Croix	St. John	St. Thomas	Virgin Islands
Less than \$15,000	24%	15%	18%	20%
\$15,000 to \$24,999	14%	15%	15%	14%
\$25,000 to \$49,000	25%	29%	28%	27%
\$50,000 to \$74,999	16%	19%	17%	17%
\$75,000 to \$99,999	9%	10%	9%	9%
\$100,000 or more	12%	13%	12%	12%

*Income in the last 12 months

Source: 2010 U.S. Census

As of the 2010 census, 20% of households had incomes under \$15,000 a year. On St. Croix, 24% of households had annual incomes under \$15,000. As of the 2009 American Community Survey, just 14% of households in the United States had incomes this low (also in 2009 inflation-adjusted dollars). About one-third of households in the Territory had incomes at or below \$2,000 a month. Given high costs in the Territory (utilities, housing, food) many households have limited choice in housing and opportunities and likely have limited choice in other necessities as well.

Low-Moderate Income Areas

Evaluate more recent HUD data than 2000, if HUD provided.

Poverty

Table 15: Poverty Status in 2009

Population/Household*	St. Croix	St. John	St. Thomas	Virgin Islands
Individuals (all)	26%	15%	19%	22%
Under 18	35%	17%	26%	31%
18 and older	23%	14%	17%	20%
65 and older	26%	14%	19%	22%
Families	22%	11%	15%	18%
Female householder (family)**	42%	21%	28%	35%

*Percent of all people in that population or household type

**No husband present

Source: 2010 U.S. Census

Note that poverty is a measure of extremely low income and does not mean that people living above poverty have enough money to meet their needs. At best, it is an indicator of the number of people and households at extreme risk.

Living Wage

The U.S. Virgin Islands Bureau of Economic Research completed two studies on living wage (The Self-Sufficiency Standard for the U.S. Virgin Islands, 2010, and Economic Analysis of the U.S. Virgin Islands Living Wage Ordinance, 2011) which examine the federal poverty level and the minimum wage compared with what it takes to live. The federal poverty level was established in the 1960s based on assumptions that are no longer sufficient to describe need. The study defines a living wage as “the wage level that a full-time worker needs to earn to support a family above the federal poverty line.”

Table 16: Living Wage by Household Composition and Insurance Provision

Household Composition	Health Insurance Employer-Provided	
	With Insurance	No Insurance
1 adult	\$10.00	\$11.46
1 adult, 1 child	\$16.28	\$19.10
2 adults*	\$15.23	\$18.09
2 adults, 1 child*	\$23.96	\$28.08
2 adults, 2 children*	\$28.75	\$32.90

*Assumes a single wage contribution.

Source: V.I. Bureau of Economic Research, Office of the Governor, *The Self-Sufficiency Standard for the US Virgin Islands*, 2010.

Similar to the process employed in many cities and states, a “self-sufficiency standard” was determined by household size and composition for the Virgin Islands, based also on whether or not the employer provided health insurance. Depending on whether health insurance is provided by the employer, the self-sufficiency wage for a full-time worker ranges between \$10.00 and \$32.90 an hour (as of 2010 estimates.) It should be noted that the standard assumes a higher contribution toward housing for single adults than is considered “affordable” by HUD standards. The “self-sufficiency” standard for a single adult with employer-provided health insurance assumes a 55% contribution toward housing; for a single adult without employer-provided health insurance, the contribution toward housing is 48% of the budget.

Table 17: USVI Living Wage and US Poverty Compared

Family Composition	US Poverty Threshold		USVI Living Wage Threshold		
	Hourly	Annual	Hourly	Annual	% of Poverty
Single person	\$5.37	\$11,161	\$10.00	\$20,806	186%
Adult + child	\$7.11	\$14,787	\$16.28	\$33,860	229%
Couple	\$6.91	\$14,366	\$15.23	\$31,687	221%
Family of 3	\$8.31	\$17,285	\$23.96	\$49,844	288%
Family of 4	\$10.50	\$21,832	\$28.75	\$59,799	274%

Source: V.I. Bureau of Economic Research, Office of the Governor, *The Self-Sufficiency Standard for the US Virgin Islands*, 2010.

Poverty levels in the United States are considerably below what is required to meet basics – the living wage. The federal minimum wage is \$7.25 an hour, which translates into \$15,080 annually, and is also below what is required to live. Comparing poverty levels by family size with the living wage estimates for the Virgin Islands demonstrates the level of vulnerability of workers in the Virgin Islands. Lack of income leaves little flexibility to face emergencies – any of which places households at risk of homelessness.

HOUSING UNITS

Number and Types of Housing Units

Table 18: Residential Properties 2010

Property Type	St. Croix	St. John	St. Thomas	Virgin Islands
Total units	25,275	3,453	27,173	55,901
1-unit detached structure	56%	49%	27%	42%
1-unit attached structure	8%	6%	7%	8%
2 to 4 units	15%	30%	39%	28%
5 to 19 units	15%	11%	18%	16%
20 or more units	3%	2%	8%	5%
Mobile home, boat, RV, other	2%	1%	1%	2%

Source: 2010 U.S. Census

As of the 2010 census, there were a total of 55,901 housing units in the Territory. About 64% of the units on St. Croix were single family (detached and attached) and about one-third were multifamily. The ratio of single family to multifamily was reversed on St. Thomas – just about one-third of total units were single family (attached and detached) and two-thirds were multifamily. Limited buildable land and the hilly terrain on St. Thomas are factors in the mix of housing types – multifamily development is more feasible option than single family units.

Occupied Units

Of the 55,901 housing units in the Territory, only 77% were occupied at the time of the census (43,214 units). This was fairly consistent across the islands with the exception of St. John – 55% of the units on St. John were occupied.

Table 19: Occupied Units and Vacancy Rates 2010

Occupancy	St. Croix	St. John	St. Thomas	Virgin Islands
Total housing units	25,275	3,453	27,173	55,901
Occupied units	19,765	1,894	21,555	43,214
Vacant units	5,510	1,559	5,618	12,687
Vacancy (percent)	22%	45%	21%	23%
Seasonal*	1,112	573	2,063	3,748
Homeowner vacancy (percent)	3.1%	9.5%	3.7%	3.6%
Rental vacancy (percent)	12.7%	40.7%	11.0%	13.6%

*Seasonal, recreational, or occasional use

Source: 2010 U.S. Census

Tenure

Slightly more households in the Virgin Islands rent than own (52% rent and 48% owned) as of the 2010 census. There was a slightly greater share of owner-occupants on St. Croix (56% owned) than St. Thomas (just 41% owned). Ownership is encouraged in the Territory to increase household and neighborhood stability.

Table 20: Tenure of Occupied Units 2010

Occupancy	St. Croix	St. John	St. Thomas	Virgin Islands
Total occupied units	19,765	1,894	21,555	43,214
Owner-occupied	56%	47%	41%	48%
Renter-occupied	44%	53%	59%	52%

*Seasonal, recreational, or occasional use
 Source: 2010 U.S. Census

HOUSING CONDITION

Age of Housing

Table 21: Year Structure Built 2010*

Year Built	St. Croix	St. John	St. Thomas	Virgin Islands
Total units	25,275	3,453	27,173	55,901
2000 or later	14%	33%	16%	16%
1980-1999	35%	43%	32%	34%
1950-1979	47%	22%	49%	46%
Before 1950	4%	2%	4%	3%

*Occupied and vacant units
 Source: 2010 U.S. Census

Table 22: Lacking Complete Plumbing and/or Kitchen Facilities 2010*

Year Built	St. Croix	St. John	St. Thomas	Virgin Islands
Total units	25,275	3,453	27,173	55,901
Lacking complete plumbing facilities	11%	5%	7%	8%
Lacking complete kitchen facilities	8%	3%	7%	7%

*Occupied and vacant units
 Source: 2010 U.S. Census

While connection to public water and sewer utilities is not an indication of quality, lack of complete plumbing and kitchen facilities is. Complete plumbing facilities consist of hot and cold piped water, a flush toilet, and a bathtub or shower; complete kitchen facilities consist of cooking facilities, refrigerator, and a sink with piped water. Eight percent of all housing units in the Territory (vacant and occupied) lack complete plumbing facilities and 7% lack complete kitchen facilities. Note that access to public water systems is the exception in the Territory. Most households safely rely on cisterns and tanks for water

and about half of all housing units rely safely on septic tanks or cesspools. This is not an indication of housing condition but descriptive of the scarcity of water and the systems in place.

Table 23: Occupants per Room 2010

Year Built	St. Croix	St. John	St. Thomas	Virgin Islands
Total occupied units	19,765	1,894	21,555	43,214
1.00 or less occupants per room	94%	94%	92%	93%
1.01 to 1.5 occupants per room	5%	4%	6%	5%
1.51 or more occupants per room	1%	2%	3%	2%

Source: 2010 U.S. Census

The vast majority of households would not be considered to be living in overcrowded conditions, but 7% are in units occupied by more than one person per room, which is considered overcrowded. Two percent of households are living in conditions of severe overcrowding, which is defined as more than 1.5 persons per room.

Definitions of Substandard and Suitable for Rehabilitation (MA20)

The operating definition of “substandard” housing is any building in which a condition exists that endangers the life, limb, health, property, safety or welfare of the public or the occupants. The definition of “substandard” includes inadequate sanitation, structural hazards, nuisances, hazardous electrical lighting, plumbing, or mechanical equipment that is not installed in accordance with generally accepted construction practices, faulty weather protection, fire hazards, faulty materials of construction, and hazardous or unsanitary premises. Housing that is “substandard but suitable for rehabilitation” is generally defined as a unit that is financially feasible (given the market conditions in the area) to rehabilitate into decent, safe, and sanitary housing.

Lead-Based Paint and Lead Hazards

The Residential Lead-Based Paint Hazard Reduction Act of 1992 seeks to identify and mitigate sources of lead in the home. A high level of lead in the blood is particularly toxic to children age six and younger. Childhood lead poisoning is the number one environmental health hazard facing American children. Lead can damage the central nervous system, cause mental retardation, convulsions and sometimes death. Even low levels of lead can result in lowered intelligence, reading and learning disabilities, decreased attention span, hyperactivity and aggressive behavior.

Children who live in homes with lead-based paint can become exposed by inadvertently ingesting or inhaling lead contained in household dust. This is particularly a problem when houses are remodeled using practices such as scraping or sanding old paint. Lead-based paint is not the only culprit. Lead has also been identified in many other sources, including some vinyl blinds, pottery, lead in water pipes, lead in dust brought into the home from work sites, certain hobbies (like lead solder in stained glass work), and some herbal remedies.

Estimated Units with Lower Income Households with Children (MA20)

Use of lead in paint was banned in 1978, but used prior to that time with increased frequency in earlier decades. According to the 2010 census, almost half of the housing in the Territory was built before 1980 (49%). Estimating the extent of lead-based paint hazards is difficult because lack of data, mitigation or abatement that has already occurred, and lack of information about deteriorating building conditions. However, a national study in 2001 established levels of risk by year the unit was built (HUD Office of Lead Hazard Control, *National Survey of Lead and Allergies in Housing, Final Report, Volume 1: Analysis of Lead Hazards*). Based on the age of unit and declining level of risk by year built, it is reasonable to estimate that as many as 1,521 owner-occupied units and 2,286 renter-occupied units contain lead hazards. While the risk is greatest for younger children, the census demonstrated that 33% of households contained children under the age of 18 which is used here to further refine the risk. Of the units with potential lead hazards, 502 owner-occupied units and 754 rent-occupied units contain children under the age of 18.

Table 24: Units with Potential Lead-Based Paint Hazards Virgin Islands

Date Built	Owner-Occupied			Renter-Occupied		
	Units	Risk*	Potential Hazard	Units	Risk	Potential Hazard
Before 1940	306	67%	205	647	67%	433
1940 to 1959	923	51%	471	1,814	51%	925
1960 to 1979	8,449	10%	845	9,282	10%	928
Total			1,521			2,286
Units with children <18		33%	502		33%	754

*Estimates of risk based on a study by R. Clickner in 2001 for the HUD Office of Lead Hazard Control (*National Survey of Lead and Allergies in Housing, Final Report, Volume 1: Analysis of Lead Hazards*)

Source: 2010 U.S. Census

Not all of these children are at risk, however. Risk increases with age of the unit (actual presence of lead) and unit deterioration (poor substrate condition), moisture intrusion and deteriorated painted surfaces. Whether rented or owned, the cost of maintenance often contributes to deteriorating conditions and risk of lead exposure. There is no mandatory testing for elevated blood-lead levels in children. The Territory’s Office of Environmental Protection does not have data on LBP in the private sector. The Department of Health does not have current studies on recent blood-lead levels in children.

The Virgin Islands Housing Authority manages a large segment of low-income housing and has procedures in place for management of lead-based paint. Most of the communities under VIHA management have been evaluated and abated as necessary and the VIHA is committed to removing all hazards from public housing. The Virgin Islands Housing Finance Authority includes LBP assessment and removal for all housing that is rehabilitated. Abatement work is included in the scope of rehabilitation as needed.

HOUSING COSTS

Costs by Tenure

About half (48%) of occupied housing units in the Territory are occupied by owners and less than half of them have a mortgage. Just 26% of occupied housing units in the Territory are occupied by households that have a mortgage. For those without a mortgage, costs for utilities, insurance, taxes, and maintenance remain, even without the expense of principal and interest associated with a mortgage.

Table 25: Cost of Housing 2010

Owner/Renter	St. Croix	St. John	St. Thomas	Virgin Islands
Occupied housing units	19,765	1,894	21,555	43,214
Owner-occupied	56%	47%	41%	48%
Renter-occupied	44%	53%	59%	52%
Median home value*	\$208,132	\$661,017	\$293,563	\$254,296
Median monthly owner costs with mortgage	\$1,326	\$2,289	\$1,750	\$1,524
Owner-occupied with a mortgage	43%	39%	49%	45%
Owner-occupied without a mortgage	57%	61%	51%	55%
Median gross rent	\$657	\$1,012	\$813	\$767

*Owner-occupant estimates

Source: 2010 U.S. Census

The median value of owner-occupied units, based on owner-occupant estimates from the census, was \$254,296 in the Territory in 2010. This is low compared to houses on the market and recent sales on the Islands. According to recent MLS data (July 2014 through March 2015 for St. John and June 2014 through June 2015 for St. Croix and St. Thomas) the average (mean) price of homes sold in St. John was \$1,137,442, in St. Thomas, \$757,523, and on St. Croix, \$342,402.

Table 26: Range of Owner Costs 2010*

Range	St. Croix	St. John	St. Thomas	Virgin Islands
Less than \$1,000	27%	9%	14%	20%
\$1,000-\$1,499	34%	16%	24%	29%
\$1,500-\$1,999	19%	15%	22%	21%
\$2,000 or more	20%	60%	40%	30%

*Households with a mortgage; includes mortgage, taxes, insurance, condo fees and utilities

Source: 2010 U.S. Census

Table 27: Range of Rents 2010*

Range	St. Croix	St. John	St. Thomas	Virgin Islands
Less than \$500	31%	6%	16%	21%
\$500-\$699	23%	11%	21%	21%
\$700-\$999	26%	32%	34%	31%
\$1,000 or more	19%	51%	30%	27%

*Includes contract rent and utilities; excludes no cash payment

Source: 2010 U.S. Census

The range of gross rents and owner costs are quite different between the islands. There is a greater share of units with gross rents below \$700 a month and owner-costs below \$1,500 a month than on St. Thomas and St. John.

Changes in Affordability Considering Current Costs (MA15)

According to data reported in the Housing Demand Study (draft 2015, Community Research Services), there has been little movement from 2005 to 2013 in the average sales prices of homes and condos on St. Croix and St. John/St. Thomas, although the latter market shows more volatility. Prices may even fall in the near future as the impact of the loss of well-paying jobs on St. Croix is fully evident. The report also notes that there may be a higher-than normal number of luxury buyers and fewer buyers of lower-end affordable housing which is influenced by the type of unit available on the market. Sales, therefore, do not necessarily reflect unmet demand. There is limited availability of lower-cost housing affordable to an employed workforce in the Virgin Islands.

The Housing Demand Study further speculates that there has been movement toward more renter-occupancy. Reasons are numerous from slow new family formation, household changes because of aging populations, slow recovery from the recession and closure of HOVENSA, increases in foreclosures, and an increased availability of rental units.

Developing new housing in the Territory is costly. The Housing Demand Study notes that development costs can be as much as three times the amount on the mainland. Factors contributing to high costs are topography, transportation, materials (including shipping), limited developers/builders, and the high cost of insurance and financing. Affordability is also affected by transportation – lower housing costs realized further from employment/urban areas are offset by higher transportation costs getting to work or town for services/necessities.

HOME and Fair Market Rents Compared to Area Costs (MA15)

Table 28: 2015 HUD Fair Market Rents (FMR) and HOME Rents

Location	Unit Size				
	0-bedroom	1-bedroom	2-bedroom	3-bedroom	4-bedroom
St. Croix					
Fair Market Rent	\$602	\$627	\$760	\$949	\$1,086
High HOME Rent	\$501	\$538	\$648	\$740	\$806
Low HOME Rent	\$388	\$416	\$498	\$576	\$642
St. Thomas/St. John					
Fair Market Rent	\$684	\$817	\$1,052	\$1,303	\$1,362
High HOME Rent	\$684	\$754	\$907	\$1039	\$1139
Low HOME Rent	\$537	\$575	\$690	\$797	\$890

Source: HUD

The Fair Market Rents are established by HUD annually to determine payment levels for Housing Choice Vouchers. The Housing Demand Study for the Virgin Islands (Community Research Services) estimated the 2015 median gross rent at levels not too dissimilar to the 2015 Fair Market Rents. However, the

Virgin Islands Housing Authority has successfully applied for waivers for an exception to the amounts from 115% to 130%, depending on the location.

Housing Affordability

Housing is deemed affordable when the cost of housing including utilities is no more than 30% of household income. For lowest income households affordable housing may be difficult to find and maintain. Housing choice and access to opportunities are largely functions of income (as represented below).

Highest Income	<ul style="list-style-type: none"> • Wide selection of housing types and locations • Option of spending more or less than 30% of income • High access to opportunities
Middle Income	<ul style="list-style-type: none"> • More limited selection of housing types and locations • May need to spend more than 30% of income for safe housing • More limited access to opportunities
Low Income	<ul style="list-style-type: none"> • Little selection of housing types and locations • High competition for market-provided, quality affordable housing • Housing may require subsidy to be affordable • Limited access to opportunities
Lowest Income	<ul style="list-style-type: none"> • Limited or no choice in housing types and locations • Housing usually requires subsidy to be affordable • May receive additional public support (food stamps, health, income support)

Housing Availability Compared to Income Levels (MA15)

Housing costs are out of reach for many households in the Territory. For example, a household with a single wage earner at minimum wage (if working full time) would earn just \$15,080 annually and could only afford (at 30% of income) \$378 a month for housing (including utilities). Fair market rent for a studio apartment is \$602 on St. Croix and \$684 in St. Thomas. Even if affordable housing was available at \$378 a month there would only be \$879 remaining for other needs.

The needs for affordable housing are compounded if a single earner at low wages has dependent children, aging parents or other family members living in and/or requiring in home support. Many jobs in the Territory are in lower paying positions associated with the tourism industry. The average wage for those working in food preparation is just \$10.73 an hour, the hourly wage for customer service is \$13.86, and the average hourly wage for sales is \$12.81 an hour. Wages at these levels are clearly below the cost of housing leaving many households vulnerable, living in overcrowded conditions, living in substandard units, and even at risk of becoming homeless.

Table 29: Income by Occupation/Source and Affordable Housing Virgin Islands

Job Type/Income Source Housing Cost Indicator	Average Hourly Wage	Average Monthly Wage	Average Annual Income	Affordable* Monthly Housing Cost	Housing Type/ Cost Indicator
Income to afford	\$49.67	\$8,609	\$103,308	\$2,583	Average 3-bdrm**
USVI Living Wage family of 4	\$28.75	\$4,983	\$59,799	\$1,495	
Income to afford	\$28.19	\$4,886	\$58,635	\$1,466	Average 2-bbdrm**
Architect/engineer	\$27.03	\$4,685	\$56,222	\$1,406	
Postal mail carriers	\$26.14	\$4,531	\$54,370	\$1,359	
Income to afford	\$20.23	\$3,507	\$42,078	\$1,052	FMR 2-bdrm STJ/STT
Community/social service	\$18.97	\$3,288	\$39,458	\$986	
Medical secretary	\$18.24	\$3,161	\$37,390	\$948	
Income to afford	\$18.02	\$3,123	\$37,482	\$937	Average 1-bdrm**
Construction	\$18.00	\$3,120	\$37,440	\$936	
Earnings male full-time workers	\$17.05	\$2,955	\$35,455	\$886	
Income to afford	\$14.75	\$2,557	\$30,680	\$767	Median gross rent VI
Income to afford	\$14.62	\$2,533	\$30,400	\$760	FMR 2-bdrm STX
Earnings female full-time worker	\$14.52	\$2,518	\$30,219	\$755	
Customer service	\$13.86	\$2,402	\$28,830	\$721	
Earnings male all workers		\$2,323	\$27,881	\$697	
Sales	\$12.81	\$2,220	\$26,645	\$666	
Healthcare support	\$12.50	\$2,167	\$26,000	\$650	
General office clerk	\$12.20	\$2,114	\$25,370	\$634	
Retirement income 2010 (mean)		\$2,113	\$25,350	\$634	
Reservation/ticket agents	\$12.06	\$2,091	\$25,090	\$627	
Hotel/resort desk clerks	\$11.85	\$2,054	\$24,650	\$616	
Earnings female all workers		\$1,895	\$22,740	\$569	
Food preparation	\$10.73	\$1,860	\$22,318	\$558	
Poverty threshold family of 4	\$10.50	\$1,819	\$21,832	\$546	
Minimum wage	\$7.25	\$1,257	\$15,080	\$378	
1-person @30% of HUD AMI STT		\$1,075	\$12,900	\$322	
Social security income 2010 (mean)		\$1,071	\$12,854	\$321	
1-person @30% of HUD AMI STX		\$799	\$9,350	\$234	

*Housing costs includes contract rent and utilities for renters and mortgage, taxes, insurance, condo fees and utilities for owners/purchasers.

**Average asking rents April 2015 (CRS, Housing Demand Study for the Territory of the Virgin Islands, draft 2015)

Sources: Occupational and Employment Wages, Bureau of Labor Statistics, May 2014; HUD FMR and AMI 2015; 2010 U.S. Census; 2012 Community Survey; USVI Bureau of Economic Research

Most Common Housing Problems (NA10)

The most common problem is cost of housing in relation to income. Unfortunately the Consolidated Plan for the Virgin Islands is being written without benefit of the HUD-provided CHAS (Comprehensive Housing Affordability Strategy) tables which are based on special tabulations of the American Community Survey provided by to HUD by the Census Bureau. Without the CHAS tables it is not possible to categorize housing problems by income, but it can be assumed that the lowest income households face the most problems.

Housing problems are defined (using CHAS data) as high cost in relation to income, overcrowding, and lack of complete plumbing and kitchens. Severe problems exist when the cost of housing including

utilities exceeds 50% of household income and when crowding exists such that there are more than 1.5 persons per room.

Condition	Problem	Severe Problems
Cost (including utilities)	>30% to 50% of household income	>50% of income
Condition	Incomplete plumbing/kitchen facilities	Incomplete plumbing/kitchen facilities
Crowding	1.01 to 1.5 occupants per room	1.51 or more occupants per room

Populations/Households most Affected by Housing Problems (NA10)

It is common, when examining CHAS data, to discover that virtually all renter and owner households with incomes at or below 30% of Area Median Income (AMI) have housing problems with diminishing percentage of problems as income increases. Low-income households are more likely to have problems and less likely to find solutions within reach.

While CHAS data are not available for the Territory, the 2010 census does provide an indication of housing problems.

- Half of all housing was built prior to 1980, some considerably before (except on St. John).
- In the Territory, 8% of all housing lacks complete plumbing facilities and 7% lacks complete kitchen facilities. The lack on St. Croix is highest – 11% of housing on St. Croix lacks complete plumbing facilities and 8% lacks complete kitchen facilities.
- Overcrowding exists in 5% of occupied housing (6% on St. Thomas) and severe overcrowding (more than 1.5 persons per room) is true of 2% of all occupied units (3% on St. Thomas).

Table 30: Rent as a Percent of Household Income 2010*

Rent to Income	St. Croix	St. John	St. Thomas	Virgin Islands
Less than 30%	55%	42%	51%	51%
30% to 49%	22%	28%	24%	24%
50% or more	23%	30%	25%	25%

*Includes contract rent and utilities; excludes no cash payment

Source: 2010 U.S. Census

Excluding households who have no cash rent, nearly half of renters in the Territory are cost-burdened. Twenty-four percent of renter households are cost burdened (paying up to 50% of their income for rent and utilities) and 25% are severely cost-burdened, paying 50% or more of their income for housing and utilities.

- In the whole Virgin Islands, 4,547 renter households are cost-burdened (paying between 30% and 50% of income for housing and utilities).
- One quarter of renter households (4,774 households) are severely cost burdened paying half or more of their income for housing.

Unfortunately data are not available for as detailed an analysis as CHAS tables allow. However, the 2010 census provides an insight into cost-burden by age of householder. Almost half (46%) of renter households age 65 and older pay 35% or more of their income for housing costs (including utilities). This

is fairly consistent across the islands. Younger householders are also cost-burdened – 39% of households with a householder aged 15 to 64 are burdened by rents and utilities costs that are 35% or more of household income. The greatest percentage of households burdened was found on St. John (48%), followed by St. Thomas (41%).

The 2010 census also provides data on cost burdens by household income. The greatest degree of cost burden is shouldered by households with lowest incomes. In the Virgin Islands as a whole, 4,762 renters with incomes less than \$20,000 were burdened by rent (including utilities) equal to 35% or more of household income. That number represented 82% of all renter households in that income range (for whom data were available). Of all renter households with incomes between \$20,000 and \$34,999, 2,230 households were burdened by high rents in relation to income and that was equal to almost half of the households (46%) in that income range.

Table 31: Rent as a Percent of Household Income by Householder Age 2010*

Rent to Income	St. Croix	St. John	St. Thomas	Virgin Islands
Householder age 15 to 64	36%	48%	41%	39%
Paying 35% or more				
Householder age 65 plus	46%	50%	46%	46%
Paying 35% or more				

*Includes contract rent and utilities; excludes no cash payment

Source: 2010 U.S. Census

Table 32: Gross Rents 35% or more of Income by Household Income 2010*

Household Income	St. Croix		St. John		St. Thomas		Virgin Islands	
	Number	% of HH	Number	%	Number	%	Number	%
Less than \$20,000	1,843	77%	171	96%	2,748	85%	4,762	82%
\$20,000 to \$34,999	539	34%	162	71%	1,529	50%	2,230	46%
\$35,000 to \$49,999	122	12%	57	35%	336	18%	515	17%
\$50,000 or more	89	5%	25	9%	140	4%	254	5%

*Number is the number of households burdened by costs 35% or more of household income; percent is the percent of all households in that income range.

Source: U.S. Census

Note that owner households are also burdened by high costs in relation to income. As with renters, households with lower income are mostly likely to have burdens. Unfortunately, data on selected owner costs as a percentage of income were not available. However, lower-income homeowners, in addition to facing costs burdens, even in homes without a mortgage, face high costs of maintenance and increasing utilities costs. Those burdens often fall disproportionately on older householders.

Single-Person Households with Needs (NA10)

The average household size is decreasing and the number of single person households is increasing – 34% of households in the Virgin Islands (2010) lived alone and 10% of all households consisting of single people were seniors (65 and older). This will likely increase because of a number of factors – young people starting out on their own, an increasing share of seniors looking for a change in living, and people

opting to live independently for other reasons. Not all will be able to achieve this on their own. Economic needs are not the only concern that must be considered going forward, needs also extend to accessibility. Safe housing for seniors on their own and persons with disabilities includes sufficient units on a single level, accessible by safe transportation, near amenities and services.

Certainly persons most in need are those who are already homeless or tenuously housed. A significant number of homeless single adults suffer from mental illness and need stabilizing services and housing in order to become self-sufficient and living to their capacity in the community. Substance abuse is often a co-occurring disorder. Whether co-occurring or not, adequate evaluation and treatment for substance abuse is also a priority for persons who are homeless or at risk of becoming homeless.

Disproportionate Need by Race/Ethnicity (NA30)

CHAS data were not available for analysis of housing problems by race/ethnicity.

Areas of Concentration of Housing Problems (MA50)

Evaluate more recent HUD data than 2000, if HUD provided.

Areas of Concentration of Minorities or Low-Income Population (MA50)

Evaluate more recent HUD data than 2000, if HUD provided.

BARRIERS TO AFFORDABLE HOUSING (MA40)

A number of factors combine to create significant barriers to production of affordable housing. There is limited acreage and steep terrain in many areas, particularly on St. Thomas, which makes acquiring and developing land for new housing costly and for affordable housing prohibitive. Even though older town areas have high density and small lots for housing, there is a preference among Virgin Islanders for single-family dwellings and larger lots (1/4 acre) which makes production of affordable housing a major challenge for leaders and other policy makers. Redevelopment of urban neighborhoods is hindered by multiple owners property combined with lack of consensus of owners toward making improvements. Vacant and deteriorating buildings in older neighborhoods on St. Croix and St. Thomas impact the availability of safe, affordable housing and also inhibit redevelopment of vibrant historic districts that would bring in businesses, employment and housing in addition to other opportunities.

There is currently no comprehensive land use plan in the Territory. Rather, land use is managed under a 1972 zoning code which is cumbersome. There is land designated for residential development in most of the zones and there are set asides for planned area developments, although those are rarely used. The Territorial government is working on updating the zoning codes. The new codes would review all zones and establish blanket policies, rather than having to rely on spot rezoning. The update will allow more clarity and flexibility in residential zones, especially between zones for low and high density housing.

Construction costs are high due to lack of indigenous building products and high shipping costs. Because the Virgin Islands are outside of the U.S. custom zone, imports from the mainland as well as foreign countries are subject to excise duty charges. There is a limited supply of local builders and developers and even construction personnel, which drives up the cost of housing development.

Lack of infrastructure also makes many potential building sites infeasible for moderately-priced construction. People outside of existing cities rely primarily on cisterns for water and septic systems for sewage disposal. Extending existing systems is very expensive and putting in new cisterns and septic systems, while less costly, is also expensive and subject to location restrictions because of soil conditions.

In 1990, following Hurricane Hugo, the losses sustained by most insurers resulting in several companies leaving the Territory. Successive natural disasters have resulted in very high costs for hazard, windstorm/earthquake, and liability insurance. As a result, the cost of insurance continues to be a major part of total mortgage payments and total housing costs for those without a mortgage, whether owners or renters. The costs of financing new housing are also very high.

Low salaries and high living costs in the Territory mean that households have limited discretionary income to save for the future. Without adequate savings for down payments and closing costs, potential purchasers cannot afford homeownership. However, home ownership is possible when funds from either a grant or a silent second mortgage are made available to assist homebuyers with the out-of-pocket charges associated with mortgage closing. VIHFA has provided subsidies as high as 50% of the cost of a new single-family home in order to make that home affordable to their target family customer.

PUBLICLY ASSISTED HOUSING

Introduction (NA35)

Two public agencies in the Virgin Islands provide affordable rental and homeownership housing units for low- and moderate- income persons and families:

- Virgin Islands Housing Authority (VIHA) which is the local Public Housing Authority and the primary provider of public housing units.
- Virgin Islands Housing Finance Authority (VIHFA) which is primarily a provider of rental and homeownership units through a variety of efforts including new construction, redevelopment, ownership assistance and housing rehabilitation.

Together the VIHA and VIHFA oversee approximately 3,900 public or assisted housing units in the Territory. The VIHA has traditionally offered housing primarily through public housing and Housing Choice Vouchers, although partnerships in new developments are using tax credits, project based vouchers and leveraging funds to provide additional new housing, notably the Louis E. Brown

developments. Part of the new development will include the badly needed senior housing (40 units). Residents will be supported by services provided by the Department of Human Services.

In addition, nonprofit organizations have been active in providing subsidized rental housing for low- and moderate-income households, such as Catholic Charities, Lutheran Social Services of the Virgin Islands, the Methodist Training and Outreach Center, the Women’s Coalition of St. Croix, and Family Resource Center in St. Thomas. The focus of these organizations, which also provide supportive services for residents, has been largely on housing for populations with special needs including victims of domestic violence, seniors, persons with disabilities and persons who are homeless.

Targeting of Housing Assistance Programs (MA10)

Housing assistance is generally targeted to the lowest income households and those who are most vulnerable but this varies with the assistance program. The Virgin Islands Housing Authority targets at least 40% of public housing program units to extremely low-income applicants (earning at or below 30% of Area Median Income). Three-quarters of households on the wait list for public housing (VIHA) had incomes at or below 40% of AMI. The VIHA targets Housing Choice Vouchers to households with incomes at or below 50% of AMI. The Virgin Island Housing Finance Authority works to achieve homeownership as one of its basic missions. Homeownership assistance is a priority, both to assist new owners into housing and to rehabilitate housing already occupied by owner households. Because of the high costs of development, ownership programs require a steep subsidy. For this reason, the majority of assisted households have incomes between 60% and 80% of Area Median Income.

Public Housing Developments (MA25)

The Virgin Islands Housing Authority manages a total of 3,299 units of public housing on St. Croix and St. Thomas in 25 communities. Of these, nine communities consisting of 1,484 units are located on St. Thomas and 16 communities consisting of 1,815 units are on St. Croix. Of the units on St. Croix, 326 are considered non-viable developments due to poor condition; 60 units (Nicasio Nico Apartments) are to be redeveloped and 264 units (Ralph deChabert Place) are currently being demolished. William’s Delight on St. Croix is in the process of converting to a homeownership community.

Table 33: Inventory of Housing Authority Public Housing Units

Project Name	Location	Units	Viable
Oswald Harris Court	St. Thomas	300	Yes
Estate Tutu	St. Thomas	305	Yes
Estate Bovoni	St. Thomas	366	Yes
Paul M. Pearson Garden	St. Thomas	120	Yes
H.H. Bergs Homes	St. Thomas	50	Yes
H.H. Bergs (Addition)	St. Thomas	24	Yes
Lucinda Millin Homes	St. Thomas	85	Yes
Michael J. Kirwan Terrace	St. Thomas	138	Yes
The Knolls at Contant	St. Thomas	96	Yes
Subtotal Viable St. Thomas		1,484	
D. Hamilton Jackson Terrace	St. Croix	110	Yes

Alphonso Gerard Complex	St. Croix	26	Yes
John F. Kennedy Terrace	St. Croix	200	Yes
Joseph E. James	St. Croix	34	Yes
Aureo Diaz Heights	St. Croix	100	Yes
Mount Pleasant	St. Croix	44	Yes
Candido Guadalupe Terrace	St. Croix	90	Yes
Marley Homes	St. Croix	34	Yes
Marley Addition	St. Croix	60	Yes
Wilford Pedro Homes	St. Croix	98	Yes
LEB I	St. Croix	77	Yes
LEB II	St. Croix	10	Yes
Subtotal Viable St. Croix		883	
Ludvig Harrigan Court	St. Croix	70	Marginal
Walter IM Hodge Pavilion	St. Croix	250	Marginal
William's Delight Villas	St. Croix	286	Marginal
Subtotal Marginal St. Croix		606	
Ralph deChabert Place	St. Croix	264	No
Mon Bijou	St. Croix	2	No
Nicasio Nico Apartment	St. Croix	60	No
Subtotal Non-Viable St. Croix		326	
Total Units		3,299	

Public Housing Condition (MA25)

The Virgin Island Housing Authority once managed a public housing inventory of 4,500 units. There was a substantial loss from two major hurricanes in the last two decades which reduced the inventory to 3,200 units. There were major needs in some of the remaining communities which resulted in the need to demolish and replace many units and to substantially upgrade others. There are currently 326 units slated for demolition on St. Croix. Condition of some units is a concern to the VIHA and to the community. Some communities with units in poor condition or with older units in fair or moderate condition have higher than optimal vacancies. Some also have had criminal activity which makes them less desirable to potential occupants.

Public Housing Restoration/Revitalization Needs (MA25)

Restoration and revitalization needs are substantial. Given the high costs of materials and labor in the Virgin Islands, the cost of rehabilitation of some units can be very high. The 2014 Master Redevelopment Plan is in the process of being updated. Existing and proposed development include a number of large projects (Louis E. Brown Villas, Nicasio Nico Apartment, and Walter IM Hodge Pavilion). It is the goal of the VIHA to bring units to good condition and to implement energy conservation and reduce utility costs, as well as being well-prepared for disasters. Maintenance and upkeep needs range from \$7,000 per units in some of those in good condition to as much as \$30,000 to \$40,000 a unit for those with more substantial needs.

Public Housing Tenant Strategy (MA25)

The ROSS (Resident Opportunity and Self-Sufficiency) Program links public housing residents to support services, activities and assistance toward becoming economically self-sufficient. ROSS Coordinators

assess needs of participating residents and coordinate available resources in the community to meet those needs. Services are geared toward enabling participating families to increase earned income, progress toward achieving economic independence and eventually attain housing self-sufficiency.

The Family Self-Sufficiency (FSS) program is a voluntary program to help public housing residents obtain education, job training, and life skills necessary to move toward financial self-sufficiency. Over the five-year contract period, when participating family members report an increase in earned income and a new rent payment is calculated, a portion of the increase in rent is deposited monthly in an escrow account established for the family. Once the head of household completes the contract of participation by achieving all listed goals and is free from welfare assistance for 12 consecutive months, the family will receive the balance of the escrow account.

Participants from both the FSS and ROSS programs have been linked to supportive services such as job readiness skills training, job search tutorials, enrollment in the University of the Virgin Islands, driving instruction, parenting skills development, computer literacy courses, employment opportunities, money management workshops, disaster preparedness, alternatives to violence workshops and domestic violence awareness workshops.

The VIHA has also obtained Youthbuild Grants that provide job training, employment and education opportunities for residents. The Youthbuild Program is designed to equip youth with skills to overcome education and employment challenges.

Vouchers/Certificates

The VIHA also manages 1,733 Housing Choice Vouchers and 177 project based vouchers.

Table 34: Virgin Island Housing Authority Units by Program Type

Housing Authority	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Project-based	Tenant-based	Special Purpose Voucher		
						VA Supportive Housing	Family Unification Program	Disabled
VIHA			3,299	177	1,733			

Source: Virgin Island Housing Authority 2015

Housing Authority Wait Lists (NA35)

The VIHA wait list for public housing (as of June 2014) included 411 households on St. Croix and 470 households on St. Thomas. In addition, there were 551 households on the wait list for the new Louis E. Brown (LEB) Phase I units on St. Croix and 51 on the wait list for LEB II units also on St. Croix. Roughly 75% of those on the wait list were extremely low income (having incomes at or below 30% of area median). Families with children accounted for about half of the wait list for all except LEB II which is targeted for the elderly and persons with disabilities.

Need of Wait List for Accessible Units (NA35)

Of all those on the wait list for housing, 189 applicants were elderly and/or households with a person with a disability.

Potential Loss of Units (MA10)

Loss of units is not anticipated other than non-viable units that will be demolished and replaced with adequate housing. There are 1,480 HUD project-based subsidized units in the Virgin Islands (according to information from the HUD Multifamily Program Center in San Juan). Two developments on St. Croix have contract expiration dates in 2015 and three (also on St. Croix) have contract expiration dates in 2016.

HOMELESSNESS**Introduction (NA40)**

National studies estimate that four to five times more people will be homeless during the year than are homeless on a given night, indicating the depth of the problem and the difficult task ahead for groups wishing to end homelessness as we know it. The causes of homelessness are myriad, but can be boiled down to two big picture causes: poverty and lack of affordable housing. Clear contributors are untreated chronic health problems, mental illness, substance abuse, domestic violence, loss of employment, and prohibitive medical bills, to name some of the factors.

The January 2015 Point-in-Time count (PIT) of homeless in the U.S. Virgin Islands found a total of 369 homeless persons in the streets, parks and other places not fit for human habitation or sheltered in emergency shelters or transitional facilities. The number found homeless annually is very consistent from year to year – the 2011 count found 366 and the 2013 county found 363 persons. It is important to note that national experts, as well as the local homeless providers who participate in the annual Point-in-Time counts, indicate that the number of homeless found during the count considerably underestimates the actual number of persons homeless at a given point.

Of the 253 persons unsheltered found during the 2015 Point-in-Time count, nearly 50% (125) of these were counted on St. Thomas, and 97 and 31 were found respectively on St. Croix and St. John. An additional 116 were found sheltered in homeless emergency shelters and transitional housing facilities on the Islands. Importantly, the majority of unsheltered homeless were single adults. Among them were 18 individuals who had severe and long-standing conditions and were categorized as chronically homeless and another 17 were persons with HIV. Homeless populations are uniformly in need of housing stability. The vast majority require significant supports from service providers to assist them toward self-sufficiency. Many homeless individuals have severe mental illness and/or substance abuse issues requiring permanent supportive housing.

Table 35: Homeless Needs Assessment

Population	Estimated # of persons experiencing homeless on a given night		Estimate experiencing homelessness each year	Estimate becoming homeless each year	Estimate exiting homelessness each year	Estimated days persons experience homelessness
	Sheltered	Unsheltered				
Persons in HH with adult(s) and children	29	0				
Persons in HH with only children	0	0				
Persons in HH with only adults	56	252				
Chronically homeless individuals	4	18				
Chronically homeless families	0	0				
Veterans	4	5				
Unaccompanied child	0	0				
Persons with HIV	1	17				

Note: At this time, the Continuum of Care HMIS does not generate data estimating the number experiencing homelessness, becoming homeless or the length of homelessness.

Source: January 2015 Point-in-Time Count, US Virgin Islands

Estimating Persons Experiencing Homelessness (NA40)

The Continuum of Care does not yet have data provided by the HMIS system to estimate the number of persons experiencing homelessness each year. It is known that the annual Point-in-Time count underestimates the number of persons who are homeless on a given night and cannot be used reliably to project the number of persons experiencing homelessness at some point during the year, the causes of homelessness, and the duration.

Extent of Homelessness by Race and Ethnicity (NA40)

The January 2015 Point-in-Time count revealed that the vast majority of those found sheltered or unsheltered in the Territory fell into two racial/ethnic groups: racially Black or African American and ethnically Hispanic. Anecdotally, homeless providers indicate that ethnic Hispanics appear to be primarily recent immigrants from the Dominican Republic or other historically Hispanic countries of the Caribbean. Many of these come to the Islands with very limited ties to any family or other support groups in the Territory.

Table 36: Sheltered and Unsheltered Homeless by Race/Ethnicity

Race/Ethnicity	Sheltered	Unsheltered
White	6	31
Black or African American	75	185
Asian	1	1
American Indian/AK Native	2	6
Hispanic		24

Source: 2015 Point-in-Time Count

Housing Needs of Those At-Risk (NA10)

Families in Need of Housing (NA40)

While the annual Point-in-Time count found no homeless veterans with families and no families categorized as chronically homeless, there were 29 persons found in non-veterans families with

children. All homeless families found were sheltered in one of the facilities of the Continuum of Care. However, many other families in the Territory are at risk of becoming homeless. They need housing assistance and services to support retention of housing. Still other families were simply not found during the annual count and are in need of housing and services. Some include family members who are suffering from developmental disabilities. Almost all persons who are homeless are unemployed. Those that may be employed are severely under-employed, with insufficient income to pay for housing and food. Many are unemployable – with major mental illness or substance abuse issues.

Homeless Housing Resources

Introduction (MA30)

The supply of housing for homeless persons is very limited given the level of poverty and housing costs. There are 82 year-around emergency shelter beds, 46 transitional housing beds and 35 permanent supportive housing beds in the Territory. There are major gaps in the housing resources for certain populations. There were 22 chronically homeless persons found in the 2015 Point-in-Time count but only eight permanent supportive housing beds to serve them. In addition, the Territory has a significant need for housing for persons with mental illness who require permanent supportive housing, yet only 35 beds are in the inventory (including the 8 beds targeted to chronically homeless persons). Similarly, many of the 18 homeless persons identified in the Point-in-Time count with HIV need permanent supportive housing. Housing specifically for persons who are victims of domestic violence are also in short supply, with only 13 transitional housing beds. Finally, only ten emergency shelter beds are available for short-term stays

Table 37: Facilities Targeted to Homeless Households

Population	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (current & new)	Voucher/ Seasonal Overflow Beds	Current & New	Current & New	Under Development
HH with adults & children	72	0	13	0	0
HH with only adults	10	0	33	35	0
Unaccompanied children	0	0	0	0	0
Chronically homeless	0	0	0	0	0
Veterans	0	0	0	0	0

Source: 2015 Housing Inventory Chart of the U. S. Virgin Islands

Services

Mainstream Services Availability (MA30)

While most of the mainstream resources that are available on the mainland are available in the Territory there are gaps and sometimes limited availability. A significant gap is lack of SSI assistance for persons with disabilities. Recent allocations of Supportive Housing for Families of Veterans (SSVF) have improved services for Veterans. Outreach services through the PATH program assist homeless person with mental illness. While employment programs are limited and potential job sources are few based on high estimated unemployment rates, the Continuum continues to work toward expanding services to meet the needs of homeless persons and those at risk of homelessness. CDBG funds will be allocated to assist

Catholic Charities in the development of a kitchen to provide food for persons who are homeless and those at risk of homelessness.

Table 38: Homeless Prevention Services Summary

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	✓	✓	✓
Legal Assistance	✓	✓	
Mortgage Assistance	✓		
Rental Assistance	✓	✓	✓
Utilities Assistance	✓	✓	✓
Street Outreach Services			
Law Enforcement	✓		
Mobile Clinics	✓	✓	✓
Other Street Outreach Services	✓	✓	
Supportive Services			
Alcohol & Drug Abuse	✓	✓	
Child Care	✓		
Education	✓		
Employment and Employment Training	✓		
Healthcare	✓	✓	✓
HIV/AIDS			
Life Skills	✓	✓	
Mental Health Counseling	✓	✓	
Transportation	✓		
Other			

Source: Consultation with stakeholders.

Nonmainstream Services Availability (MA30)

Just some of the nonmainstream services available include those provided by the Department of Human Services (crisis stabilization, intake and emergency services, job training and prescription assistance). The Department of Health provides medical assistance, community health and mental health services. Work Able, Inc. provides job development and placement programs. Catholic Charities provides a free medical and dental clinic as well as food and clothing. Case management, counseling, outreach and referral are provided by the Methodist Training and Outreach Center.

While there is broad array of services available in the Continuum to assist persons who are homeless, there are significant gaps in the system. A key deficiency in the services delivery system is the lack of financial resources on which to build a full system of housing and services. For homeless persons, there are insufficient resources to meet the needs for transitional housing and accompanying services. Among the areas where additional services capacity is needed are mental health evaluation, treatment and support; child care; education supports; job employment and training; and, transportation. Permanent housing with supportive services also remains a significant unmet need.

As indicated in the above Homeless Prevention Services Summary table, there are limited resources targeted to persons with HIV/AIDS. Among the limited HIV services are education and advocacy

provided by VI CARE and The Village (partners in Recovery). As a result, case managers serving persons with HIV/AIDS must compete with other populations at risk or homeless for services and resources.

POPULATIONS WITH SPECIAL NEEDS

Introduction (NA45)

Some populations are especially vulnerable and will likely have temporary or long-term requirements for additional support. These include people who will need special support because of disabilities (age-related, physical, developmental, or mental), because of trauma (violence in the home or community, trauma from war), because of illness, and because of substance abuse. Some of the most vulnerable people are homeless or at-risk of homelessness. There is a frustrating lack of data to describe the level of need. Care for many is along a continuum often started with crisis intervention. The most humane and least costly solutions are those that provide the appropriate level of support to allow people to live as independently as possible. Community and family caregivers are integral to support.

Types of Special Needs (NA45)

Elderly/frail elderly

The elderly are vulnerable on many fronts. Many have reduced income with retirement – surviving spouses even more so. The average retirement income for older households was \$25,350 in 2009 and the average social security income was \$12,854. Twenty-two percent of seniors (65 and older) lived below the poverty level (\$11,161 for singles in 2009) which was just over half (56%) of what it actually takes to survive in the Virgin Islands (living wage \$20,806). One-third (32%) of seniors had a disability, generally ambulatory. With age difficulties increase. Isolation is often undetected. Many seniors live alone (10% of households in the Territory were seniors living alone – more women than men).

Persons with Physical Disabilities and Developmental Disabilities

The census found 10% of the population with disabilities, with 2% of children under 18 and 8% of adults aged 18 to 64 with one or more disabilities. Nearly one-third of older persons, as noted, have a disability serious enough to interfere with daily functioning.

Table 39: Populations with Disabilities* 2010

Age Range	St. Croix	St. John	St. Thomas	Virgin Islands
All ages	11%	7%	9%	10%
Under 18	3%	2%	2%	2%
18 to 64	9%	6%	7%	8%
65 and older	34%	22%	31%	32%

*Noninstitutionalized populations

Source: U.S. Census

The level of disability, of course, dictates needs. Persons with intellectual or developmental disabilities (I/DD) may require long-term support, usually met within the family and usually with inadequate

additional public support. Regardless of the level of disability, access to transportation, a social and community network, recreation, suitable housing, employment with sufficient accommodations or other financial support are important. Unfortunately there is no SSI in the Virgin Islands, which removes even this meager support (SSI in the United States was \$733 per month in 2015). Employment is low for persons with disabilities.

Persons with Mental Illness

Untreated mental illness is a priority need in the Virgin Islands. It is a primary contributor to homelessness. Lack of mental health services was the subject of a legislative hearing in June 2015 and is a top priority for a number of advocates, including stakeholders interviewed in developing this Consolidated Plan. The Territory has an active Mental Health Services Committee which meets quarterly and is charged with the responsibility of advocating for improved mental health services. The Disability Rights Center of the Virgin Islands in the 2008 *Working Toward an Effective Mental Health Care System* notes that national studies estimate that one in four adults as a diagnosable mental disorder. There is a lack of mental health services, case management and residential placement resulting in continuous cycles of homelessness for persons without family support or other alternatives. Even with family supports, the strain on family caregivers is an important consideration. Beyond limited hospital treatment in the case of emergencies, there is no network of support for persons with serious mental illness.

Persons with Drug and Alcohol Dependency

Data on drug and alcohol abuse and dependency on the Virgin Islands are almost absent. Substance abuse is often co-occurring with mental illness and a contributor to homelessness. People suffering from mental illness and/or substance use disorders are often overrepresented in correctional and detention facilities. The U.S. Virgin Islands Policy Academy State Profile, reporting on results of the 2011 Behavioral Risk Factor Surveillance System Survey, notes that 20% of men and 13% of women in the Virgin Islands over 50 reported binge drinking, which is higher than national results (16% of men and 9% of women reported binge drinking).

Domestic Violence

Data on the actual occurrence of domestic violence are remarkably limited. Certainly violence in the home and in relationships cuts across societal measures – income, occupation, race, and ethnicity. Statistics are limited to some extent by the sources of data. National crime databases show reported incidences, those to which police respond – both men and women can be charged in a single incidence.

The National Network to End Domestic Violence reports on violence from another perspective – those seeking help from agencies. This is a snapshot of the more vulnerable – those who experience barriers in escaping violence such as lack of income, lack of personal esteem, immigrant status, absence of family or peer support. The *2014 Domestic Violence Counts* that reports on the 24-hour count reports that 122 victims were served in the Virgin Islands on a single day. (Both local domestic violence programs reported for this census in September 2014.) The programs reported that 122 victims were served on

that day; 33 victims receive shelter (22 children and 11 adults); and, 89 victims received non-residential assistance and services (counseling, legal advocacy, children's support). Sadly, 13 requests for services could not be met.

Persons with HIV/AIDS and their families (NA45)

Over 5% of the adults found in the homeless Point-in-Time count suffered from HIV/AIDS.

Housing and Supportive Service Needs (NA45, MA35)

Housing Needs for People with Disabilities and Victims of Domestic Violence (NA10)

There is no sure way to estimate the true extent of the population in need. As noted, there is a frustrating lack of reliable data. The agencies serving victims of domestic violence report that they are almost always able to provide shelter in an emergency to victims, but there is a lack of long-term support. Domestic violence is a significant contributor to family disruption and homelessness, particularly for those without resources to escape violence on their own. Safe housing for people with disabilities and victims of domestic violence means affordable, secure housing for some and services for most. Providers of housing and services for persons who are victimized by domestic violence have indicated there is a need for additional safe transitional housing beds for homeless persons fleeing domestic violence and for counseling services as well as employment and job training programs to assist both homeless and those at risk of homelessness.

Ten percent of all Territory residents reported a disability in the 2010 census and this was highest among the elderly (32% reported a disability). People of working age (18 to 64) with a disability were much less likely to be employed than persons without a disability. There is no SSI for persons with disabilities in the Virgin Islands pointing to a need for basic supports. There is a need to bolster both in-home care support and housing for persons with disabilities.

Needs for Housing and Supportive Services (NA45, MA35)

The aging population will need additional supportive services in the years ahead which are mirrored in other populations with special needs including persons with mental illness, substance abuse problems, HIV/AIDS, and those with developmental or physical disabilities. For all, the overriding understanding is that self-sufficiency and independence are primary goals, while being connected to the community and family. Supportive services and case management are necessary during crisis intervention and stabilization and, for some, on an ongoing basis. For victims of domestic violence and persons with mental illness or disabilities, the needs go beyond crisis and short-term intervention. A flexible system of support is required to assist the individual or family to achieve self-sufficiency.

Discharge Planning (MA35)

The Continuum (specifically the Discharge Planning Committee) is working to strengthen protocols with hospitals to reduce the potential for persons becoming homeless upon discharge. However, few housing resources are available for persons released from health facilities. Subject to vacancies, the following are potential resources for persons being discharged: the Department of Human Services; Frederiksted

Baptist Church (Eagles Nest Men’s Shelter); Methodist Training and Outreach Center; Catholic Charities; Ten Thousand Helpers; the Village; and, St. Croix Mission Outreach. The Continuum recognizes that there are insufficient housing resources to meet the demand for persons released from hospitals and is working to expand those resources over the next few years.

NON-HOUSING COMMUNITY DEVELOPMENT

To be included in final document

STRATEGIC PLAN

Introduction (SP05)

This strategic plan sets priority needs and goals for the Virgin Islands over the next five years. Priorities were established after review of relevant economic information and statistical data, broad discussions in the community, consideration of strategic plans of partner agencies and providers in the region, and available planning documents.

Four priority needs were established, each a high priority:

- Affordable housing choice
- Homelessness services and facilities
- Public and community services
- Infrastructure, facilities and economic development

Four goals were established to meet the needs:

- Increase and preserve affordable housing units
- Reduce and prevent homelessness
- Provide services and community support
- Support community and economic development

GEOGRAPHIC PRIORITIES (SP10)

There are currently no designated or HUD-approved geographic target areas in the Territory. Activities will take place for the benefit and opportunity of low- and moderate-income persons across all three islands appropriate to the funded-program. The Territory also recognizes the benefit of focusing funding to achieve maximum benefit in particular areas, if the opportunity should arise, so that neighborhoods are lifted out of poverty or business areas are revitalized to create or retain badly needed jobs and safe housing.

PRIORITY NEEDS

Table 40: Priority Needs Summary

Priority Need Name: Affordable housing choice
Priority Level: High
Goals Addressing: Increase and preserve affordable housing units
Geographic Areas Affected: N/A

<p>Population: Income: extremely low, low, moderate Family types: large families, families with children, elderly Non-homeless special needs: persons with mental disabilities, persons with physical disabilities, persons with developmental disabilities, victims of domestic violence</p>
<p>Basis for Relative Priority: Safe affordable housing is the first priority for helping families to self-sufficiency, improving neighborhoods and creating stability. Housing is out of reach for lower income households in the Virgin Islands; 25% of households are paying more than 50% of household income for rent; without deep subsidies, homeownership is out of reach for low income households.</p>
<p>Priority Need Name: Homelessness services and facilities</p>
<p>Priority Level: High</p>
<p>Goals Addressing: Reduce and prevent homelessness</p>
<p>Geographic Areas Affected: N/A</p>
<p>Population: Income: extremely low, low Family types: large families, families with children, elderly Homeless: chronic homelessness, individuals, families with children, mentally ill, veterans, victims of domestic violence, unaccompanied youth Non-homeless special needs: elderly, frail elderly, persons w/mental disabilities, persons w/physical disabilities, persons with developmental disabilities, persons with alcohol or other addictions, victims of domestic violence</p>
<p>Basis for Relative Priority: Provision of supports for the most vulnerable populations, including homeless persons, is the most important step to reducing and eliminating homelessness. Untreated mental health problems result in a continuous cycle of homelessness and inappropriate treatment through non-mental health systems. Similarly, adequate supportive housing, services and case management is the urgent need for maintaining stability and preventing homelessness.</p>
<p>Priority Need Name: Public and community services</p>
<p>Priority Level: High</p>
<p>Goals Addressing: Provide services and community support</p>
<p>Geographic Areas Affected: N/A</p>
<p>Population: Income: extremely low, low, moderate, middle Family types: large families, families with children, elderly Non-homeless special needs: non-housing community development</p>
<p>Basis for Relative Priority: Poverty is prevalent in the Territory – 22% of all residents lived in poverty in 2010, which is a measure far below actual need. Youth are at-risk with limited community supports and poor graduation rates. There is a high priority need for services to the most vulnerable including persons with mental illness, persons with substance abuse problems, victims of domestic violence and other vulnerable populations in the community.</p>
<p>Priority Need Name: Infrastructure, facilities and economic development</p>
<p>Priority Level: High</p>
<p>Goals Addressing: Support community and economic development</p>
<p>Geographic Areas Affected: N/A</p>
<p>Population: Income: extremely low, low, moderate, middle Family types: large families, families with children, elderly Non-homeless special needs: non-housing community development</p>
<p>Basis for Relative Priority: Infrastructure improvement and support for community facilities is a high priority. Facilities deliver vital services in the Territory to vulnerable populations including youth and populations with special needs. The need for economic and neighborhood revitalization far outstrips available funding.</p>

Influence of Market Conditions (SP30)

Table 41: Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Not applicable (no tenant-based rental assistance)
TBRA for non-homeless special needs	Not applicable (no tenant-based rental assistance)

ANTICIPATED RESOURCES

Introduction (SP35)

Resources from federal CDBG, ESG and HOME grants expected during the remaining four years of the Consolidated Plan are based on allocations during the first year, with a reasonable expectation of program and other income shown. However, allocations have been declining over the past several years and, if that continues to be the case, both expected funding amounts and outcomes will be modified accordingly.

Table 42: Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Amount Available Remainder of Plan
			Annual Allocation	Program Income	Prior Year Resources	Total	
CDBG	Federal	Acquisition; Admin & planning; Economic development; Housing; Public improvements; Public services	\$1,964,566	\$0	\$157,460	\$2,122,026	\$8,488,104
HOME	Federal	Acquisition; Homebuyer assistance; Homeowner rehab; Multifamily rental new construction; Multifamily rental rehab; New construction for ownerships	\$607,775	\$250,000	\$0	\$857,775	\$3,431,100
ESG	Federal	Conversion and rehab for transitional housing; Financial assistance; Overnight shelter; Rapid rehousing (rental assistance); Rental assistance; Services; Transitional housing	\$152,446	\$0	\$0	\$152,446	\$609,784

Leveraging Funds and Matching Requirements (SP35)

As an insular area, there is no requirement for the Virgin Islands to match HOME funding. The match for the ESG program will be provided primarily by nonprofit subrecipient organizations (such as Catholic Charities, Methodist Training and Outreach, Inc. and St. Croix Mission Outreach) through fundraising and from United Way.

The Territory looks to funds from other sources including local government, nonprofit organizations, fund-raising and community foundations to supplement federal grants. In addition to matches described above, resources from USDA, Housing Choice Vouchers, local Homestead Loan funds, federal Low Income Housing Tax Credits, the local Stamp Tax, and the Virgin Islands government have increased the ability to meet Territorial needs.

The Virgin Islands Housing Finance Authority created a nonprofit subsidiary (VI Housing Management, Inc.) which expanded access to financing sources such as Low Income Housing Tax Credits. This creates increased opportunities for rehabilitation of rental housing, including those properties acquired by the VIHFA as a result of the 2008 housing merger. HOME Program funds for home ownership assistance are used primarily as subsidy (secondary) financing in conjunction with primary financing provided by other lenders. HOME funds are used for mortgage buy downs, closing cost assistance and filling other gaps in lending requirements. For a majority of the assisted households, USDA Rural Development's 502 Direct Lending Program (a federally funded program) provides the primary financing. Rural Development provides subsidized mortgages for very-low and low-income families. This increases the number of households VIHFA is able to assist. In other cases on a limited basis, local government lending programs or conventional lenders provide the primary financing.

USDA Rural Development's Section 504 Repair program assists very-low income homeowners to repair their unit to remove health and safety hazards. From time to time, both the VIHFA and USDA Rural Development refer owner-occupied rehabilitation applicants to the other agency for additional financing. The collaboration between VIHFA's HOME Program and USDA Rural Development provides for the leveraging of HOME funds which enables both agencies to expand the number of households that can be assisted and the scope of repairs/improvements that can be undertaken.

New rental units can be funded using federal Low Income Housing Tax Credits and renters, including those coming from homelessness and persons with special needs, can be housed using Housing Choice Vouchers administered by the VI Housing Authority – the local PHA. Housing Choice Vouchers can also be used for home-ownership assistance, which increases the potential for collaboration with local lenders, especially the USDA Rural Development.

The Government of the Virgin Islands has made various tax exemptions available to developers of low- and moderate-income housing under an Affordable Housing Development Agreement. Also at the local level, the VIHFA is able to utilize proceeds from the Stamp Tax to subsidize housing development and/or purchase land for the Affordable Housing Program.

Anticipated Use of Publicly-Owned Land/Property (SP35)

Use of publicly-owned resources has been beneficial in meeting needs in the past and use of those resources is anticipated in the future. Notably, the Virgin Islands Housing Finance Authority has provided house plots at below-market prices which helps make homeownership more affordable. The house plot,

along with the included infrastructure, results in an average subsidy of \$25,000. The Government of the Virgin Islands likewise has transferred developable land from the central government’s inventory to the VIHFA for development of affordable housing.

INSTITUTIONAL DELIVERY SYSTEM

Table 43: Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Geographic Area Served
Virgin Islands Housing Finance Authority		Jurisdiction

Strengths and Gaps in Institutional Delivery System (SP40)

Table 44: Homeless Prevention Services Summary*

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	✓	✓	✓
Legal Assistance	✓	✓	
Mortgage Assistance	✓		
Rental Assistance	✓	✓	✓
Utilities Assistance	✓	✓	✓
Street Outreach Services			
Law Enforcement	✓		
Mobile Clinics	✓	✓	✓
Other Street Outreach Services	✓	✓	
Supportive Services			
Alcohol & Drug Abuse	✓	✓	
Child Care	✓		
Education	✓		
Employment and Employment Training	✓		
Healthcare	✓	✓	✓
HIV/AIDS			
Life Skills	✓	✓	
Mental Health Counseling	✓	✓	
Transportation	✓		

Note: Table ___ in Homeless Section.
 Source: Consultation with stakeholders.

Service Delivery in Relation to Needs (SP40)

The service delivery system outlined above provides a base for serving the needs of low and moderate income households, including those who are vulnerable and/or homeless. As discussed below however, there are areas where populations are either not served or are underserved.

Strengths and Gaps (SP40)

One of the strengths of the Territory is the close working relationships that the Continuum of Care has developed with its members over the years. In addition, staff resources available at VIHFA to support

planning and management of projects has improved the institutional capacity. The quality of the homeless housing and the services that are available to meet the needs of persons at risk and those who are homeless is strong.

While the quality is strong, the extent of the resources is very limited, leaving gaps in the delivery system. A strong priority need is for mental health triage, treatment and permanent supportive housing. Services, where available, are limited thus leaving people with untreated disorders to fend for themselves and fall repeatedly into homelessness.

The greatest weakness is the lack of financial resources on which to build a full system of housing and services for persons who are homeless or at-risk of homelessness and low and moderate income persons. For low and moderate income households, an inadequate supply of affordable housing is a major need. For homeless persons, there are insufficient resources to meet the needs for additional transitional housing units and accompanying services to assist in returning participants to self-sufficiency. Among the areas where additional services capacity is needed are mental health evaluation, treatment and case management, child care, education supports, job employment and training, and transportation. Permanent supportive housing is also a significant unmet need particularly for people with mental health problems, substance abuse and (frequently) co-occurring disorders.

While there is a broad array of services available in the Continuum to assist the homeless and persons who have HIV, there are significant gaps in the system. As the table on homeless prevention services indicates, there are only limited resources targeted to the HIV populations. As a result, case managers serving persons with HIV must compete with other populations at risk or homeless for services. The Territory does not receive a formula allocation of HOPWA funds which further limits capacity.

Strategy for Overcoming Gaps (SP40)

The Territory will undertake a number of steps to improve the institutional response to the needs identified. The Continuum will be strengthened by recruiting participation from additional agencies. The Continuum will also work toward development of new transitional housing and permanent supportive housing and to fully implement the Supportive Housing for Families of Veterans (SSVF) program as it works to end veteran homelessness.

HUD resources will be allocated to focus on the highest priority gaps in the system. In 2015-2016, CDBG funds will be used to develop a 10-bed emergency shelter facility and increase transitional beds by 17 and land will be set aside to construct additional homeless housing. The VIHA and the VIHFA will work together to develop new affordable housing for low and moderate income households. Over the next few years, the VIHA will continue to implement its plan to upgrade its housing stock through demolition/replacement with tax credit projects and through rehabilitation of salvageable public housing. VIHFA will utilize tax credit financing to increase its stock of affordable housing and will use HOME funds to continue to provide homeownership opportunities and improve homeowner housing.

GOALS

Goal Name	Increase and preserve affordable housing units
Start year	2015
End year	2019
Category	Affordable housing Public housing
Geographic area	N/A
Needs addressed	Affordable housing choice
Goal outcome indicator	Homeowner housing rehabilitated: 15 housing units; Direct financial assistance to homeowners: 40 households assisted
Description	Projects will likely include acquisition, demolition or preparation of sites for affordable housing; homebuyer direct financial and other assistance; and, homeowner housing rehabilitation.
Goal Name	Reduce and prevent homelessness
Start year	2015
End year	2019
Category	Homeless
Geographic area	N/A
Needs addressed	Homelessness services and facilities
Goal outcome indicator	Overnight emergency shelter, transitional housing beds added: 57 persons assisted
Description	Projects would include improvements to emergency shelters, transitional facilities or permanent supportive housing; operations of emergency shelters, transitional housing facilities or permanent supportive housing; construction of emergency, transitional housing facilities or permanent supportive housing; preparation of homeless housing sites; rapid rehousing; construction of other homeless facilities such as soup kitchens and outreach facilities; and, prevention and other services, including but not limited to outreach, counseling, medical and mental assistance and case management.
Goal Name	Provide services and community support
Start year	2015
End year	2019
Category	Homeless Non-homeless special needs
Geographic area	N/A
Needs addressed	Public and community services
Goal outcome indicator	Public service activities other than low/ moderate-income housing benefit: 4,025 persons assisted; Public service activities for low/moderate income housing benefit: 300 households assisted
Description	Projects under this goal will likely include services to assist lower income households and neighborhoods, including vulnerable youth; and, projects to assist other vulnerable populations, including those with special needs.
Goal Name	Support community and economic development

Start year	2015
End year	2019
Category	Non-housing community development
Geographic area	N/A
Needs addressed	Infrastructure, facilities and economic development
Goal outcome indicator	Public facility or infrastructure activities other than low/moderate-income housing benefit: 10,000 persons assisted; Public facility or infrastructure activities for low/ moderate income housing benefit: 117 persons assisted; Overnight emergency shelter, transitional housing beds added: ____ persons assisted; Buildings demolished: 2 buildings
Description	Projects will include acquisition, development and rehabilitation of public facilities for delivery of public services; renovation of public facilities to provide handicapped accessibility and other improvements; support for infrastructure improvements; building demolition; and projects to support economic opportunities.

PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT

Need to Increase Number of Accessible Units (SP50)

Not applicable (no required 504 Voluntary Agreement in effect)

Activities to Increase Resident Involvement and Homeownership (SP50)

The ROSS (Resident Opportunity and Self-Sufficiency) Program links public housing residents to support services, activities and assistance toward becoming economically self-sufficient. ROSS Coordinators assess needs of participating residents and coordinate available resources in the community to meet those needs. Services are geared toward enabling participating families to increase earned income, progress toward achieving economic independence and eventually attain housing self-sufficiency.

The Family Self-Sufficiency (FSS) program is a voluntary program to help public housing residents obtain education, job training, and life skills necessary to move toward financial self-sufficiency. Over the five-year contract period, when participating family members report an increase in earned income and a new rent payment is calculated, a portion of the increase in rent is deposited monthly in an escrow account established for the family. Once the head of household completes the contract of participation by achieving all listed goals and is free from welfare assistance for 12 consecutive months, the family will receive the balance of the escrow account.

Participants from both the FSS and ROSS programs have been linked to supportive services such as job readiness skills training, job search tutorials, enrollment in the University of the Virgin Islands, driving instruction, parenting skills development, computer literacy courses, employment opportunities, money management workshops, disaster preparedness, alternatives to violence workshops and domestic violence awareness workshops.

The VIHA has also obtained Youthbuild Grants that provide job training, employment and education opportunities for residents. The Youthbuild Program is designed to equip youth with skills to overcome education and employment challenges.

Troubled Agency Status and Plan to Remove (SP50)

As of 2014, the VIHA (the local PHA) has been returned to the control of the local government after more than ten years of receivership by HUD and is no longer considered a troubled agency.

BARRIERS TO AFFORDABLE HOUSING

A number of factors combine to create significant barriers to production of affordable housing. There is limited acreage and steep terrain in many areas, particularly on St. Thomas, which makes acquiring and developing land for new housing costly and for affordable housing prohibitive. Even though older town areas have high density and small lots for housing, there is a preference among Virgin Islanders for single-family dwellings and larger lots (1/4 acre) which makes production of affordable housing a major challenge for leaders and other policy makers. Redevelopment of urban neighborhoods is hindered by multiple owners property combined with lack of consensus of owners toward making improvements. Vacant and deteriorating buildings in older neighborhoods on St. Croix and St. Thomas impact the availability of safe, affordable housing and also inhibit redevelopment of vibrant historic districts that would bring in businesses, employment and housing in addition to other opportunities.

There is currently no comprehensive land use plan in the Territory. Rather, land use is managed under a 1972 zoning code which is cumbersome. There is land designated for residential development in most of the zones and there are set asides for planned area developments, although those are rarely used. The Territorial government is working on updating the zoning codes. The new codes would review all zones and establish blanket policies, rather than having to rely on spot rezoning. The update will allow more clarity and flexibility in residential zones, especially between zones for low and high density housing.

Construction costs are high due to lack of indigenous building products and high shipping costs. Because the Virgin Islands are outside of the U.S. custom zone, imports from the mainland as well as foreign countries are subject to excise duty charges. There is a limited supply of local builders and developers and even construction personnel, which drives up the cost of housing development.

Lack of infrastructure also makes many potential building sites infeasible for moderately-priced construction. People outside of existing cities rely primarily on cisterns for water and septic systems for sewage disposal. Extending existing systems is very expensive and putting in new cisterns and septic systems, while less costly, is also expensive and subject to location restrictions because of soil conditions.

In 1990, following Hurricane Hugo, the losses sustained by most insurers resulting in several companies leaving the Territory. Successive natural disasters have resulted in very high costs for hazard, windstorm/earthquake, and liability insurance. As a result, the cost of insurance continues to be a major part of total mortgage payments and total housing costs for those without a mortgage, whether owners or renters. The costs of financing new housing are also very high.

Low salaries and high living costs in the Territory mean that households have limited discretionary income to save for the future. Without adequate savings for down payments and closing costs, potential purchasers cannot afford homeownership. However, home ownership is possible when funds from either a grant or a silent second mortgage are made available to assist homebuyers with the out-of-pocket charges associated with mortgage closing. VIHFA has provided subsidies as high as 50% of the cost of a new single-family home in order to make that home affordable to their target family customer.

Strategies to Remove Barriers to Affordable Housing (SP-55)

There is significant support for affordable housing. HOME Program funds are all allocated to affordable housing. The Virgin Islands Housing Finance Authority (VIHFA) has programs to increase homeownership, including programs in cooperation with the VI Housing Authority and other partners (e.g., USDA Rural Development). The VIHFA and the Territorial government have provided land for housing at reduced costs, which represents a substantial subsidy for both the lot and infrastructure.

The Virgin Islands Territorial government is also working on updating the zoning codes to establish blanket policies, rather than having to rely on spot rezoning. The update will allow more flexibility in residential zones, especially between zones for low and high density housing, which will be a step toward developing small multifamily projects (such as 4-plexes) in more areas and more clarity about where they can be located, thereby allowing for more density and lower costs.

Certain tax benefits are granted to every person, firm partnership, joint venture, or corporation that executes an Affordable Housing Development Agreement for the production of affordable housing. All local corporate income taxes allocable to the project are also waived. The cost savings serve to reduce development costs and translate into more affordable purchase prices.

Stamp Tax revenues collected by the Territorial government have been used by the VIHFA to develop an in-house lending program (Single Family Loan Purchase Program) to assist first-time homebuyers who are unable to qualify for assistance under the HOME Program. Housing counseling and homebuyer education courses make applicants ready to purchase and maintain housing. This has been extended in the past and is available to qualifying public housing residents. Note that while the Stamp Tax is an asset, the challenges posed by the local government's fiscal situation means that Stamp Tax allotments are sometimes delayed or withheld.

HOMELESSNESS STRATEGY

Reaching Out and Assessing Needs of Homeless Persons (SP60)

The Territory's 2012-2015 Continuum of Care Strategic Plan includes several steps to improve outreach and assessment of need. Among the specific steps are 1) share information among members of the CoC regarding services provided and gaps in services, 2) meet frequently to coordinate cases and identify systems problems, and 3) increase the number of organizations using HMIS in order to increase access to data and facilitate coordination of services and collaborations among members. Continuums of Care members are utilizing the PATH Program to conduct outreach to persons on the street or in abandoned homes who have mental illness. A free medical clinic is provided at the Catholic Charities shelter in St. Thomas.

Meeting Emergency and Transitional Housing Needs (SP60)

The Territory will use its HUD resources strategically to reduce homeless in the islands while seeking additional funding from federal and local resources. The Territory will utilize its ESG resources to support the operations of three emergency shelters, expand street outreach and provide rapid rehousing resources. For the first time, support will be provided for homeless services on the island of St. John, which has been a longstanding unmet need. CDBG funds will be used to prevent homelessness and to create new emergency shelter and transitional housing beds to work toward reducing homelessness. In addition, the Continuum will continue develop its coordinated intake and assessment capacity to improve the assessment and placement of homeless persons.

Rapid Rehousing and Successful Transition to Permanent Housing (SP60)

The Continuum of Care and its members are working toward the goal of ending chronic homelessness by the end of 2015. Efforts made in the past two years to increase beds for chronically homeless persons and homeless persons with special needs, such as HIV/AIDs, have resulted in increased resources and assistance to reduce the length of homelessness experienced by those populations and providing stabilization of permanent housing. New VASH housing vouchers will help meet some of the needs of veterans and additional units are being sought.

In addition, the Continuum's 2012-2015 Strategic Plan includes several steps to improve the housing stability of targeted populations including 1) creating a comprehensive, collaborative system to support individuals and families toward self-sufficiency, 2) increasing resources for permanent housing opportunities and decreasing the number of persons who are homeless and do not receive services, and 3) increasing joint funding of programs and services among members.

LEAD-BASED PAINT HAZARDS

Actions to Remove LBP Hazards (SP65)

Efforts will continue to improve the detection of lead based paint hazards as well as to mitigate or remove the hazards where necessary. These efforts include:

- Coordinate public and private efforts to reduce lead-based paint hazards and protect young children. Work with key housing agencies to increase the capacity of public and nonprofit agencies involved in housing rehabilitation activities to assess lead-based paint hazards. Methods of sharing the costs of lead-based paint hazards assessments will be explored with other agencies.
- Integrate lead hazard evaluation and reduction activities into existing housing programs. Integrate activities to identify and reduce lead hazards with all government-assisted housing rehabilitation activities.
- Promote comprehensive public health programs. Support the development of programs with capability for screening, follow-up of children identified as lead poisoned, public education and prevention.
- Provide public information and education. Clearly communicate the extent of the lead problem and the measures to be taken to reduce risk and protect health.
- Lead Paint Remediation: Work with other Territorial agencies to identify and implement effective remediation strategies.

Actions Related to Extent of Hazards (SP65)

To be added

Integration with Procedures (SP65)

To be added

ANTI-POVERTY STRATEGY

Goals, Programs, Policies to Reduce Poverty (SP70)

The Territory has established the following goals in the Consolidated Plan aimed at reducing poverty:

1. Increase and preserve affordable housing choice – By providing new affordable housing as part of its affordable housing planning, the Territory will increase the number of households with housing they can afford. By affordable rents and improving homeowner housing through rehabilitation and subsequent reduction of housing maintenance costs, assisted households will have reduced expenses.
2. Reduce and prevent homelessness – By targeting resources at some of the more vulnerable populations that are currently housed, public services and counseling is intended to be used to help stabilize their housing situation, preventing their fall into homelessness and poverty. For

others, the homeless services as well as emergency shelters will help stabilize their lives so that they may have an improved opportunity to return to self-sufficiency and move out of poverty.

3. Provide services and community support – Many of the public services provided through the CDBG allocations will provide supports to people in need. In some cases, the assistance may only stabilize their lives to prevent them from becoming homeless but in other cases such as the educational, employment and counseling programs, the assistance may contribute to their ability to avoid delinquency, enhance academic performance, and ultimately rise out of poverty.
4. Support community and economic development – Job creation and increased income from employment are directly related to reducing the number of households in poverty.

Coordination with Affordable Housing Plan (SP70)

The Virgin Islands Housing Finance Authority and the Virgin Islands Housing Authority work closely together to address affordable housing needs in the Territory. The agencies have partnered to provide housing solutions, including leveraging funds to increase units provided.

MONITORING (SP80)

The Virgin Islands Housing Finance Authority regularly monitors projects and subrecipients. Experience has taught that lack of grant program experience can lead to poor compliance. VIHFA uses monitoring visits to determine compliance but also as an opportunity to provide technical assistance and training on program requirements. This technical assistance will strengthen agencies (to improve implementation), increase expectations (to maintain high quality), and improve performance. Interviews, file reviews, and project site visits are among the methods that are used to monitor agencies and programs and will be aggressively employed. VIHFA intends to continue with an aggressive vigilance to support subrecipients to implement projects in a timely and effective manner.

Each sub-recipient is required to execute a contract prior to the disbursement of funds; the subrecipient contract agreement serves as the primary monitoring tool. VIHFA staff conducts a comprehensive monitoring review of each CDBG project and ESG activity annually to ensure the activities being carried out are in compliance with federal requirements and those of the contract. To further improve performance and to avoid delays, VIHFA construction management works with project architects to make sure designs are modest and can be accomplished within the proposed budget and/or that the proposer has demonstrated sufficient additional resources to successfully complete the project.

Monitoring will include identifying projects that are not making sufficient progress to make an early determination of appropriate corrective actions to include reprogramming of funds. A part of the VIFHA's monitoring effort to ensure that reallocated funds are used in a timely manner includes examining project onset within three months of issuance of notice to proceed to ensure project completion within a timeframe appropriate to the task (e.g., service or construction). VIHFA carefully reviews projects for compliance.

VIHFA staff conducts on-site monitoring of each HOME Program project during the construction or rehabilitation to ensure that work is performed in accordance with the scope and meets applicable construction standards and local building codes. Monitoring is ongoing throughout the duration of the project. HOME rental units are subject to periodic physical inspections and project owners complete annual reports and maintain records of income certifications and leases.

FIRST YEAR ACTION PLAN

Introduction (AP15)

Resources from federal CDBG, ESG and HOME grants expected during the remaining four years of the Consolidated Plan are based on allocations during the first year, with a reasonable expectation of program and other income shown. However, allocations have been declining over the past several years and, if that continues to be the case, both expected funding amounts and outcomes will be modified accordingly.

EXPECTED RESOURCES

Table 45: Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Amount Available Remainder of Plan
			Annual Allocation	Program Income	Prior Year Resources	Total	
CDBG	Federal	Acquisition, Admin & planning, Economic development, Housing, Public improvements, Public services	\$1,964,566	\$0	\$157,460	\$2,122,026	\$8,488,104
ESG	Federal	Conversion & rehab for Transitional housing, Financial assistance, Overnight shelter, Rapid rehousing (rental assistance), Rental assistance, Services, Transitional housing	\$152,446	\$0	\$0	\$152,446	\$609,784
HOME	Federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership, TBRA	\$607,775	\$250,000	\$0	\$857,775	\$3,431,100

Leveraging Funds and Matching Requirements (AP15)

As an insular area, there is no requirement for the Virgin Islands to match HOME funding. The match for the ESG program will be provided primarily by nonprofit subrecipient organizations (such as Catholic Charities, Methodist Training and Outreach, Inc. and St. Croix Mission Outreach) through fundraising and from United Way.

The Territory looks to funds from other sources including local government, nonprofit organizations, fund-raising and community foundations to supplement federal grants. In addition to matches described above, resources from USDA, Housing Choice Vouchers, local Homestead Loan funds, federal Low Income Housing Tax Credits, the local Stamp Tax, and the Virgin Islands government have increased the ability to meet Territorial needs.

The Virgin Islands Housing Finance Authority created a nonprofit subsidiary (VI Housing Management, Inc.) which expanded access to financing sources such as Low Income Housing Tax Credits. This creates increased opportunities for rehabilitation of rental housing, including those properties acquired by the VIHFA after the 2008 housing merger. HOME Program funds for home ownership assistance are used primarily as subsidy (secondary) financing in conjunction with primary financing provided by other lenders. HOME funds are used for mortgage buy downs, closing cost assistance and filling other gaps in lending requirements. For a majority of the assisted households, USDA Rural Development's 502 Direct Lending Program (a federally funded program) provides the primary financing. Rural Development provides subsidized mortgages for very-low and low-income families. This increases the number of households VIHFA is able to assist. In other cases on a limited basis, local government lending programs or conventional lenders provide the primary financing.

USDA Rural Development's Section 504 Repair program assists very-low income homeowners to repair their unit to remove health and safety hazards. From time to time, both the VIHFA and USDA Rural Development refer owner-occupied rehabilitation applicants to the other agency for additional financing. The collaboration between VIHFA's HOME Program and USDA Rural Development provides for the leveraging of HOME funds which enables both agencies to expand the number of households that can be assisted and the scope of repairs/improvements that can be undertaken.

New rental units can be funded using federal Low Income Housing Tax Credits and renters, including those coming from homelessness and persons with special needs, can be housed using Housing Choice Vouchers administered by the VI Housing Authority – the local PHA. Housing Choice Vouchers can also be used for home-ownership assistance, which increases the potential for collaboration with local lenders, especially the USDA Rural Development.

The Government of the Virgin Islands has made various tax exemptions available to developers of low- and moderate-income housing under an Affordable Housing Development Agreement. Also at the local level, the VIHFA is able to utilize proceeds from the Stamp Tax to subsidize housing development and/or purchase land for the Affordable Housing Program.

Use of Publicly-Owned Land or Property (AP15)

Use of publicly-owned resources has been beneficial in meeting needs in the past and use of those resources is anticipated in the future. Notably, the Virgin Islands Housing Finance Authority has provided house plots at below-market prices which helps homeownership more affordable. The house plot, including infrastructure, results in an average subsidy of \$25,000. The Government of the Virgin Islands likewise has transferred developable land from the central government's inventory to the VIHFA for development of affordable housing.

ANNUAL GOALS AND OBJECTIVES

Table 46: Goals Summary

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Increase & preserve affordable housing units	2015	2016	Affordable housing Public housing	Territory	Affordable housing choice	HOME: \$766,609	Homeowner housing rehabilitated: 3 housing units; Direct financial assistance to homeowners: 8 households assisted
Reduce & prevent homelessness	2015	2016	Homeless Non-homeless special needs	Territory	Homelessness services & facilities	CDBG: \$306,281 ESG: \$141,013	Overnight emergency shelter, transitional housing beds added: 57 persons assisted
Provide services & community support	2015	2016	Non-homeless special needs	Territory	Public & community services	CDBG: \$294,681	Public service activities other than low/moderate-income housing benefit: 805 persons assisted; Public service activities for low/moderate income housing benefit: 60 households assisted
Support community & economic development	2015	2016	Non-housing community development	Territory	Infrastructure, facilities & economic development	CDBG: \$1,128,151	Public facility or infrastructure activities other than low/moderate-income housing benefit: ___ persons assisted; Public facility or infrastructure activities for low/moderate income housing benefit: 117 persons assisted; Overnight emergency shelter, transitional housing beds added: 17 persons assisted; Buildings demolished: 2 buildings

PROJECTS

Table 47: Project Information

Project #	Project Name
	CDBG program administration
STT-01	Wesley After-school program
STT-03	Bordeaux Farmers' Market
STT-05	St. Andrews After-school program
STT-10	Hearts in Services transitional housing
STT-13	Family Resource Center youth counseling program

STT-15	Family Resource Center shelter sewer line improvement
STT-16	Boys & Girls After-school program
STT-17	VIHFA building demolition
STX-01	Caribbean Museum Center improvements
STX-02	City of Refuge After-school program
STX-03	Women with Focus After-school program
STX-04	Catholic Charities transitional housing
STX-05	Ruby M. Rouss storm water improvements
STX-06	Civil Air Patrol building acquisition/renovation
STX-07	Mon Bijou After-school program
STX-08	Mon Bijou Community Center construction
STX-09	Frederiksted Boys & Girls After-school program
STX-10	Garden School After-school program
STX-11	Christiansted Boys & Girls sewer improvements
STX-13	VI Housing Authority After-school program
	HOME program administration
	HOME Ownership assistance fund
	HOME owner housing rehabilitation
	ESG program administration
	St. Croix Mission Outreach
	St. John Community Foundation
	V.I. Partners in Recovery
	Women's Coalition
	Homeless Prevention, Rapid Rehousing

Table 48: Project Summary Information (AP38)

	Project name	CDBG program administration
	Target area	N/A
	Goals supported	Reduce & prevent homelessness Provide services & community support Support community & economic development
	Needs addressed	Homelessness services & facilities Public & community services Infrastructure, facilities & economic development
	Funding	CDBG: \$392,913
	Description	Program administration
	Location description	Territory-wide
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	N/A
STT-01	Project name	Wesley After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$37,250
	Description	After-school homework assistance program
	Location description	St. Thomas
	Planned activity	

	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 70 persons assisted
STT-03	Project name	Bordeaux Farmers' Market
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$73,000
	Description	VI Department of Agriculture market, Site infrastructure improvements to include construction of retaining walls, parking area and vendor kiosk platform
	Location description	#109 Bordeaux, St. Thomas
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public facility or infrastructure activities other than low/moderate-income housing benefit: ____ persons assisted
STT-05	Project name	St. Andrews After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$37,826
	Description	After-school program offering arts and crafts and cultural activities
	Location description	ST. Thomas, Lockhart Elementary School
	Planned activity	After-school homework assistance, tutorials and computer training; arts and craft, and cultural training.
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 100 persons assisted
STT-10	Project name	Hearts in Services transitional housing
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	CDBG: \$231,281
	Description	Continuation of construction of transitional housing facility. This phase entails construction of one 2-bed room unit (4 beds); also shutters and improvements
	Location description	#1738-88A Anna's Retreat, St. Thomas
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Overnight/emergency shelter/transitional housing beds added: 8 beds
STT-13	Project name	Family Resource Center youth counseling program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$38,750
	Description	Family Resource Center youth crisis intervention and counseling program for youth that display negative and/or disruptive behaviors in home, school, or community settings
	Location description	St. Thomas/St. John

	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 300 persons assisted
STT-15	Project name	Family Resource Center sewer line improvement
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$124,465
	Description	Plumbing infrastructure repairs to domestic violence shelter facility which would restore to operational capacity 4 restrooms and reopen shelter beds temporarily closed
	Location description	St. Thomas (address suppressed)
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Overnight/Emergency shelter/Transitional housing beds added: 17 beds
STT-16	Project name	Boys & Girls After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$29,000
	Description	After-school program providing homework assistance, financial management, computer skills and nutrition/physical activity
	Location description	St. Thomas, Oswald Harris Court Community Center
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 50 persons assisted
STT-17	Project name	VI Housing Finance Authority building demolition
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$300,000
	Description	Demolition and asbestos remediation of 2 vacant buildings on abandoned housing site. Site to be redeveloped to provide 60 units of affordable housing.
	Location description	#13 Norsidevei, St. Thomas
	Planned activity	
	Target date	
	Indicator/outcome	Buildings demolished: 2 buildings
STX-01	Project name	Caribbean Museum Center improvements
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$50,178
	Description	Caribbean Museum Center renovations, including those to improve safety and handicap accessibility
	Location description	Strand Street, Frederiksted, St. Croix

	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public facility or infrastructure activities other than low/moderate-income housing benefit: ___persons assisted
STX-02	Project name	City of Refuge After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$33,500
	Description	After-school program involving homework assistance, counseling, tutorials in math, social studies, science and other academic subjects as well as musical instruction.
	Location description	#303 Barren Spot, St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 100 persons assisted
STX-03	Project name	Women with Focus After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$27,500
	Description	After-school program aimed at enhancing academic skills and career awareness and prevention of drug use. Program also provides music and arts and crafts education
	Location description	ST. Croix in the Lorraine Village Apartments and Evenly Williams Elementary School.
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 40 persons assisted
STX-04	Project name	Catholic Charities VI transitional housing
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	CDBG: \$75,000
	Description	Construction of transitional housing facility and soup kitchen
	Location description	#16 Friedenstahl, Christiansted, St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Overnight/Emergency shelter/Transitional housing beds added: 10 beds
STX-05	Project name	Ruby M. Rouss storm water improvements
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$90,500
	Description	Site infrastructure improvements to existing water storm systems to allow proper drainage of excess rain and ground water
	Location	St. Croix

	description	
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public facility or infrastructure activities for low/moderate-income housing benefit: 117 households assisted
STX-06	Project name	Civil Air Patrol building acquisition and renovation
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$250,058
	Description	Acquisition and renovation of existing vacant building to create headquarters for Civil Air Patrol program
	Location description	#18 & 7A Estate Mint, St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public facility or infrastructure activities other than low/moderate-income housing benefit: ___ persons assisted
STX-07	Project name	Mon Bijou After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$33,000
	Description	After-school, summer enrichment and martial arts program for at-risk youth
	Location description	Mon Bijou, St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 75 persons assisted
STX-08	Project name	Mon Bijou Community Center construction
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$89,450
	Description	Continue development of Mon Bijou community center
	Location description	#29S, #29R and #29Q Mon Bijou, St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public facility or infrastructure activities other than low/moderate-income housing benefit: 700 persons assisted
STX-09	Project name	Frederiksted Boys & Girls After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$27,255
	Description	After-school program providing homework assistance, financial management, computer skills and nutrition/physical activities
	Location description	Frederiksted, St. Croix

	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 50 persons assisted
STX-10	Project name	Garden School After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$15,600
	Description	After-school reading enhancement program
	Location description	St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities other than low/moderate-income housing benefit: 20 persons assisted
STX-11	Project name	Christiansted Boys & Girls Club sewer improvements
	Target area	N/A
	Goals supported	Support community & economic development
	Needs addressed	Infrastructure, facilities & economic development
	Funding	CDBG: \$150,500
	Description	Installation of new plumbing infrastructure at existing building which serves as the clubhouse for the Christiansted Boys & Girls Club program
	Location description	#7 Market, Christiansted, St. Croix
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public facility or infrastructure activities other than low/moderate-income housing benefit: 50 persons assisted
STX-13	Project name	VI Housing Authority After-school program
	Target area	N/A
	Goals supported	Provide services & community support
	Needs addressed	Public & community services
	Funding	CDBG: \$15,000
	Description	After-school tutorial program
	Location description	St. Croix, Aureo Diaz Heights housing communities
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Public service activities for low/moderate-income housing benefit: 60 households assisted
	Project name	St. Croix Mission Outreach
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	ESG: \$20,800
	Description	Emergency shelter operations
	Location description	
	Planned activity	
	Target date	2015-2016

	Indicator/outcome	
	Project name	St. John Community Foundation
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	ESG: \$20,000
	Description	Street outreach
	Location description	
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	
	Project name	V.I. Partners in Recovery
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	ESG: \$33,168
	Description	Emergency shelter operations; street outreach
	Location description	
	Planned activity	
	Target date	
	Indicator/outcome	
	Project name	Women's Coalition
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	ESG: \$17,500
	Description	Emergency shelter
	Location description	
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	
	Project name	Homeless Prevention, Rapid Rehousing
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	ESG: \$49,545
	Description	Homeless prevention, rapid rehousing
	Location description	
	Planned activity	
	Target date	
	Indicator/outcome	
	Project name	ESG Administration
	Target area	N/A
	Goals supported	Reduce & prevent homelessness
	Needs addressed	Homelessness services & facilities
	Funding	ESG: \$11,433
	Description	

	Location description	
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	
	Project name	HOME Ownership Assistance Fund
	Target area	N/A
	Goals supported	Increase & preserve affordable housing units
	Needs addressed	Affordable housing choice
	Funding	HOME: \$666,609
	Description	
	Location description	
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	Direct financial assistance to homebuyers: 8 households assisted
	Project name	HOME owner housing rehabilitation
	Target area	N/A
	Goals supported	Increase & preserve affordable housing units
	Needs addressed	Affordable housing choice
	Funding	HOME: \$100,000
	Description	
	Location description	
	Planned activity	
	Target date	
	Indicator/outcome	Homeowner housing rehabilitated: 3 households housing units
	Project name	HOME program administration
	Target area	N/A
	Goals supported	Increase & preserve affordable housing units
	Needs addressed	Affordable housing choice
	Funding	HOME: \$91,166
	Description	
	Location description	
	Planned activity	
	Target date	2015-2016
	Indicator/outcome	N/A

Allocation Priorities and Barriers (AP35)

Allocations of funds were made consistent with the analysis of identified needs and goals set out in the Consolidated Plan and 5-Year Strategic Plan, the availability of other funds, and the capacity of partners and subrecipients to meet needs (based on an application process). Community organizations were invited to submit proposals that were consistent with eligible guidelines to meet identified needs. Determination of allocation was based on project-appropriateness for meeting the need, capacity/experience of the applicant, proximity of the project’s location to the persons intended to receive service, project cost and project readiness.

Proposals received were consistent with historical uses of funds in the Territory. CDBG funds have historically been used primarily for projects that provide after-school programs and to public and neighborhood facilities. All funds benefit low- and moderate-income persons and neighborhoods. The primary use of HOME Program funds has been financial assistance to first-time homebuyers with a secondary use for owner-occupied housing rehabilitation. An emphasis on homeownership helps to improve the economic self-sufficiency of households and potentially increase the stability of neighborhoods. ESG program funds are used for homeless programs in consultation with the Virgin Islands Continuum of Care recommendations.

The Territory does not anticipate barriers or obstacles to meeting the underserved needs addressed by the annual projects, provided funding levels are as anticipated.

GEOGRAPHIC DISTRIBUTION

There are currently no designated or HUD-approved geographic target areas in the Territory. Activities will take place for the benefit and opportunity of low- and moderate-income persons across all three islands appropriate to the funded-program. The Territory also recognizes the benefit of focusing funding to achieve maximum benefit in particular areas, if the opportunity should arise, so that neighborhoods are lifted out of poverty or business areas are revitalized to create or retain badly needed jobs and safe housing.

AFFORDABLE HOUSING

Table 49: One Year Goals for Affordable Housing by Support Requirements

One-Year Goals for the Number of Households to be Supported	
Homeless	
Non-homeless	
Special needs	
Total	

Table 50: One Year Goals for Affordable Housing by Support Type

One-Year Goals for the Number of Households to be Supported	
Rental assistance	
Production of new units	
Rehab of existing units	
Acquisition of existing units	
Total	

PUBLIC HOUSING

Actions to Support Public Housing Needs (AP60)

The Virgin Islands Housing Finance Authority will continue to support the needs of the Virgin Islands Housing Authority and public residents during the next year. The VIHFA and the VIHA will continue to expand cooperation between the two housing providers including referral of public housing tenants in the FSS (Family Self-Sufficiency) Program and those receiving Housing Choice Vouchers to VIHFA to apply for the homebuyer program, to receive pre-purchase counseling or homebuyer education. Increased coordination and collaboration between the agencies has resulted in the construction of new units using Project-Based Section 8 funds and Low Income Housing Tax Credits, among other sources of financing. VIHA has designed a homeownership program and partnered with the VIHFA to provide homeownership counseling and mortgage financing with various banking and mortgage institutions for residents of Williams Delight on St. Croix. Residents will be screened and processed for the homeownership program.

The activities of the annual Action Plan are consistent with the needs and goals of public housing residents. Housing stability and opportunities for self-sufficiency are key elements of both VIHA's goals and the long-term objectives of the Territory's Consolidated Plan. On a broad level, the use of CDBG funds for public services supports the needs of low- and moderate-income households - many of whom are public housing residents. In addition, the homeownership programs of VIHFA also offer first-time homeownership opportunities for low- and moderate-income households – which generally include public housing tenants.

Actions to Encourage Residents (AP60)

The ROSS (Resident Opportunity and Self-Sufficiency) Program links public housing residents to support services, activities and assistance toward becoming economically self-sufficient. ROSS Coordinators assess needs of participating residents and coordinate available resources in the community to meet those needs. Services are geared toward enabling participating families to increase earned income, progress toward achieving economic independence and eventually attain housing self-sufficiency.

The Family Self-Sufficiency (FSS) program is a voluntary program to help public housing residents obtain education, job training, and life skills necessary to move toward financial self-sufficiency. Over the five-year contract period, when participating family members report an increase in earned income and a new rent payment is calculated, a portion of the increase in rent is deposited monthly in an escrow account established for the family. Once the head of household completes the contract of participation by achieving all listed goals and is free from welfare assistance for 12 consecutive months, the family will receive the balance of the escrow account.

Participants from both the FSS and ROSS programs have been linked to supportive services such as job readiness skills training, job search tutorials, enrollment in the University of the Virgin Islands, driving instruction, parenting skills development, computer literacy courses, employment opportunities, money

management workshops, disaster preparedness, alternatives to violence workshops and domestic violence awareness workshops.

The VIHA has also obtained Youthbuild Grants that provide job training, employment and education opportunities for residents. The Youthbuild Program is designed to equip youth with skills to overcome education and employment challenges.

Troubled Designation (AP60)

The Virgin Islands Housing Authority is not designated as troubled. In 2014, the VIHA was returned to the control of the local government after more than ten years of receivership by HUD. During the receivership, the local government worked closely with HUD to make improvements to the Territory's aging public housing stock and to accomplish the refurbishment of a number of off-line apartments in order to return them to service. VIHA also resolved a number of deficiencies that were noted. As a result of the transfer, VIHA is currently being managed locally, with a two-year transition period during which HUD continues to provide consultation and technical assistance to the Board and monitor progress toward meeting the goals of the transition plan and ensuring sustainability of the recovery.

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES

Assessing Individual Needs (AP65)

The Continuum of Care will continue to work toward improving the quality of the Point-in-Time count and expanding the use of HMIS data to provide basic information on homeless needs. These data sources will provide the Continuum and its members with comparative data on which to assess gaps in housing and services and determine individual needs.

Outreach, assessment and placement for homeless persons with mental illness will continue to be conducted through the PATH Program. In addition, as the Continuum moves toward full implementation of the intake and assessment system, the process of assessing individual needs to determine appropriate placement will be improved. The intake process includes conducting initial evaluations of the client including verification of eligibility for housing.

Addressing Emergency Shelter and Transitional Housing Needs (AP65)

ESG funds may be used to pay rental application fees, security deposit, and first month's rent at move-in to assist in move-in costs under either homelessness prevention or rapid rehousing assistance. In cases where rapid rehousing assistance is being provided by the ESG Program, it will be used for payment of utility deposits, to assist the tenant to obtain electrical and/or potable water service. The ESG Program will provide rapid rehousing resources and prevention services to persons in need. In 2015-2016 Catholic Charities will use CDBG funds to complete development of its #16 Friedensthal facility on St. Croix which will include ten transitional housing beds and a kitchen.

Transitions to Permanent Housing and Homeless Prevention (AP65)

Under the Territory's ESG homelessness prevention/rapid rehousing assistance program, funds may be used to pay for housing search/placement and case management services to support transition to permanent housing in 2015-2016 including intake services or activities necessary to assist program participants in locating, obtaining, or retaining suitable permanent housing, and case management activities (counseling, coordinating and securing benefits, conducting re-certifications and reevaluations) which result in program participants achieving permanent housing stability. Stabilizing case management services include developing individualized housing and service plans; coordinating referrals and services and assisting the participant to secure benefits, as appropriate; and, monitoring and evaluating the participant's progress toward achieving the milestones of the housing stability plan.

A major step toward improving transitions to permanent housing will be taken by Catholic Charities with construction of a 10-bed transitional housing facility. In addition, the Territory will continue to seek ways to resolve the relocation of persons living in housing classified as "emergency housing" but occupied by households using it as permanent housing. The Territory has been awarded twelve new VASH Vouchers for Veterans with Permanent Supportive Housing needs; these vouchers will assist veterans to transition to housing stability.

Assistance with Discharge Housing and services (AP65)

In 2015-2016, the Continuum will continue to work toward developing and strengthening protocols with the Bureau of Corrections and area hospitals to reduce the potential for persons being discharged from institutions in the Territory to homelessness. In addition, the MOU between the Continuum's Discharge Planning Committee, the HMIS Administrator and the Commissioner of Human Services will help prevent youth graduating out of foster care from falling into homelessness. Subject to vacancies, the following are potential resources for persons being discharged from institutions: Department of Human Services; Baptist Church (Eagles Nest); Methodist Training and Outreach Center; Catholic Charities; Ten Thousand Helpers; the Village; and, St. Croix Mission Outreach. The Continuum recognizes that there are insufficient housing resources to meet the demand for housing persons coming from the institutions and will work toward expanding those resources in the 2015-2016 year.

BARRIERS TO AFFORDABLE HOUSING (AP75)

In the Virgin Islands, a number of factors combine to create significant barriers to affordable housing. These include the limited supply of buildable land, the high cost of utilities and infrastructure, prohibitively high costs of insurance, lack of centrally supplied water and sewer service for most areas, limited federal program funding, and the strained fiscal condition of the Territorial government. Large deficits and flat revenues virtually preclude significant local support for housing programs. Costs are high and incomes of Virgin Island residents are low.

A number of the programs seek to reduce barriers to affordable housing. HOME Program funds are all allocated to affordable housing. The VIHFA has programs to increase homeownership, including programs in cooperation with the VI Housing Authority and other partners (e.g., USDA Rural Development). The VIHFA and the Territorial government have provided land for housing at reduced costs, which represents a substantial subsidy for both the lot and infrastructure. Certain tax benefits are granted to every person, firm partnership, joint venture, or corporation that executes an Affordable Housing Development Agreement for the production of affordable housing. All local corporate income taxes allocable to the project are also waived. The cost savings serve to reduce development costs and translate into more affordable purchase prices.

Stamp Tax revenues collected by the Territorial government have been used by the VIHFA to develop an in-house lending program (Single Family Loan Purchase Program) to assist first-time homebuyers who are unable to qualify for assistance under the HOME Program. Housing counseling and homebuyer education courses make applicants ready to purchase and maintain housing. This has been extended in the past and is available to qualifying public housing residents.

The Virgin Islands Territorial government is also working on updating the zoning codes. The current code (last updated in 1972) is cumbersome to work with. The new codes are anticipated to review zones and establish blanket policies, rather than having to rely on spot rezoning. There is sufficient allowance in the existing code for housing in 18 zones; however, the update will allow more clarity and flexibility in residential zones, especially between zones for low and high density housing.

OTHER ACTIONS

Actions to Meet Underserved Needs (AP85)

The VIHFA and the VIHA will continue to expand cooperation between the two housing providers including referral of public housing tenants who are in the Family Self-Sufficiency (FSS) program and those in the Housing Choice Voucher program to VIHFA to apply for its homebuyer program, to receive pre-purchase counseling or homebuyer education. VIHFA continues to work collaboratively with USDA Rural Development to structure affordable financing packages with a focus on increasing the number of low-income households achieving home ownership. The objective is to facilitate the creation of innovative financing packages, structured within the framework of both programs, which ultimately will result in increased home ownership opportunity for clients from typically underserved populations.

Other actions to be taken include additional capacity-building relative to the Continuum of Care to improve the potential to obtain additional resources under the new Continuum of Care Program and increase both services and housing to homeless in the Territory. The VIHFA serves as the designated CoC Lead Agency. This is also expected to improve the coordination of homeless programs/services. Finally, homeless providers are planning to work cooperatively to continue annual Homeless Connect events that engage the homeless and bring together in one location the various homeless programs/services.

Under a recent policy (2011-2012), the local emergency housing program was restructured requiring emergency housing applicants to be represented by an approved service provider agency to act as provider, coordinator, or referral agency for the range of supportive/community services that may be needed by or available to the applicant. The local emergency housing program has entered into Memoranda of Understanding with several service providers and strengthened relationships with others.

Actions toward Affordable Housing (AP85)

The many programs and opportunities, current and in development, offered by VIHFA and the VIHA are aimed at increasing affordable housing. HOME Program projects will increase homeownership opportunities, expanded by the ability to leverage funds. As a result of the consolidation of the local government’s rental and home ownership housing programs under VIHFA, program coordination, implementation and management between the rental and home ownership programs continue to improve. With local housing programs under common management, VIHFA becomes a “one-stop shop” for rental and homeownership housing. This, combined with existing programs, increases access and processing expediency.

The VIHFA hosts public forums (Housing Expos) annually to present information on programs and promote awareness of the various affordable housing opportunities. In addition, various home ownership programs now have a centralized application process and determination of eligibility for the program most appropriate to the need/ situation of the particular applicant. This now allows for the implementation of a true continuum approach to the delivery of housing services.

Actions to Reduce Lead-Based Paint Hazards (AP85)

Limited residential rehabilitation is proposed in the current year. The HOME Program tends to rehabilitate properties which have limited condition issues in order to stretch scarce funds and, in the short term, will be prioritized to benefit elderly householders, thus avoiding risks for children. In the event that a project with potential Lead-Based Paint (LBP) hazards is to be rehabilitated, VIHFA will comply fully with the requirements and abate any hazards.

During this program year, no CDBG and ESG funds are expected to be provided for residential rehabilitation. Where applicable, sub-grantees will be required to follow LBP requirements, will be given instruction on the specific requirements and will be monitored to assure compliance. As part of the procedures, information will be provided to property owners and occupants on the dangers of Lead-Based Paint, and potentially hazardous surfaces will be properly covered when found.

Actions to Reduce Number of Poverty-Level Families (AP85)

One of the goals of the 2015-2019 Consolidated Plan is to support community and economic development. Several projects in the next year will support community development. These projects

include support for improvements at the Bordeaux Farmer’s Market in St. Thomas which has the potential to increase use of the market and support local vendors.

Annual projects support programs and activities assisting the homeless to become as self-sufficient as possible through new or improved housing and facilities, supportive services and preventative services, with particular emphasis on assistance to chronic homeless persons and to persons with mental illness and addiction to substances. Projects provide support for youth, including a structured environment to reinforce education and positive behaviors in order to reduce juvenile delinquency and school drop-outs and end thus the cycle of poverty. Projects continue to support and expand services for special needs populations including (among others) youth, the elderly, domestic violence victims, physically and mentally challenged, chronic substance abusers and persons with the AIDS virus, with special emphasis for persons suffering from substance abuse or mental illness.

In addition, increased coordination of programs and services with the Continuum of Care and the Department of Human Services will be essential to assure that activities under the Plan have a maximum impact. Families living in poverty will be assisted with their basic needs by expanding outreach to persons at risk and in crisis. Support for and strengthening of the Continuum of Care will provide key services and support to persons in need, many of whom are homeless or at-risk of becoming homeless.

A number of existing housing initiatives tie into the antipoverty strategy. Use of HOME funds for home ownership assistance creates opportunities for lower-income households to become home owners in any neighborhood across the Territory which enables lower-income families to relocate to neighborhoods that provide more opportunities. Successful collaboration between VIHFA’s HOME Program and USDA Rural Development’s Direct Lending Program enables many low-income households who were previously rent-burdened to achieve home ownership with affordable payments. The Family Self-Sufficiency Program and the Housing Choice Voucher Home Ownership program, both of which are administered locally by the Virgin Islands Housing Authority have the goal of assisting lower-income households to achieve home ownership. The Family Self-Sufficiency Program helps families save toward down payment and closing costs, while the Housing Choice Voucher home ownership program subsidizes the family’s monthly housing payment for up to ten years. Increasing housing choice for lower-income households has long-term positive economic effects; owning a home enables the household to build equity, which can be parlayed into greater purchasing power and thus moving families away from poverty.

Actions to Develop Institutional Structure (AP85)

Consolidation of all local housing programs under the Virgin Islands Housing Finance Authority and transfer of administrative oversight for CDBG and ESG Programs to VIHFA were significant steps toward strengthening the capacity of the institutional structure. Since those changes, the VIHFA has continued to work toward fine-tuning its organizational structure and expanding staff capacity to ensure efficient delivery of services. In addition, the VIHFA created a nonprofit subsidiary (VI Housing Management, Inc.) to manage the inventory of rental properties, which both increases capacity and increases efficiency.

The Virgin Islands Housing Finance Authority has recently been accepted as a member of the Federal Home Loan Bank of New York (FHLBNY). This association will expand the VIHFA’s capacity to finance housing and economic development activities throughout the Virgin Islands. Membership in the Federal Home Loan Bank of New York is a significant accomplishment as it will open new doors to finance and develop new housing opportunities for the residents of the Territory. As a member, the VIHFA will have access to capital which can be used for low-interest construction loans thereby affording contractors with another avenue to obtain project financing. This will continue to foster growth and development opportunities and promote economic stability in the Virgin Islands.

Actions to Enhance Coordination (AP85)

The relationship which exists between the VIHFA and the Virgin Islands Housing Authority (VIHA), the two main providers of affordable (assisted) housing, is further strengthened by partnering on projects that rehabilitate and/or construct new units of housing. An example is the receipt of low income housing tax credit allocations for the Louis E. Brown Villas in St. Croix. The VIHFA and VIHA also entered into agreements to provide services to public housing residents to facilitate readiness for homeownership.

The VIHFA has a full-time staff position dedicated to the implementation of the ESG Program and the development of policies to reduce homelessness and increase services available to persons who are homeless or at-risk of becoming homeless. This has made for better coordination and exchange between VIHFA and other entities making up the Interagency Council on Homelessness and the Continuum of Care. Member agencies, many funded with CDBG and ESG grant funds, are strengthened by ongoing technical assistance and monitoring activities.

The Virgin Islands Housing Finance Authority also spearheads the local Emergency Housing Task Force which outlines resources and strategies to employ in the case of a disaster (including hurricanes, tornadoes, and/or tsunamis).The Plan was completed during 2013-2014 and Memoranda of Understanding are in place outlining functions and roles in disaster management.

PROGRAM SPECIFIC REQUIREMENTS

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee’s strategic plan	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income	\$0

Other CDBG Requirements

1. The amount of urgent need activities	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	100%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

To be provided

EMERGENCY SOLUTIONS GRANT (ESG) Reference 91.220(I)(4)

Written standards for providing ESG assistance (may include as attachment)

To be provided

Description of centralized or coordinated assessment system

Not applicable. A HUD-approved centralized or coordinated assessment system has not yet been established.

Process for making sub-awards and ESG allocation availability to private nonprofit organizations (including community and faith-based organizations) (AP90)

The Territory utilizes a public solicitation process to obtain proposals from organizations seeking to carry out projects utilizing ESG funds. Interested organizations are required to complete a standard application form provided by VIHFA. The form requires the applicant to provide a detailed description of the proposed project, the clientele to be served, the need that will be met, the project budget, other funding sources, and the qualifications of key personnel. An evaluation team comprised of ESG staff and also representatives of the local CoC review the applications using an evaluation tool that has been developed for the purpose. Funds are allocation to the applicants taking into consideration statutory funding limitations as well as other factors such as areas of demonstrated greatest need, among others.

If jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The VIHFA has put in place measures requiring that all nonprofit subrecipients have at least one current or former homeless person on either the Board of Directors or an advisory board. (In the case of organizations utilizing ESG funds to provide facilities and/or services to victims of domestic violence, the requirement is that the organization has at least one current or former victim of domestic violence on either the Board of Directors or an advisory board. Compliance with this requirement is verified during the compliance monitoring process.