

## Recovery Voucher Grant Program

*Helping people diagnosed  
with Opioid Use Disorder  
find safe interim housing*

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## Program Manual

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## Grant Year 2023

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State of Wisconsin

Department of Administration

Division of Energy, Housing and  
Community Resources

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Provides program rules and  
guidance for the Recovery  
Voucher Grant Program

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Last Revised September 2022

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## Chapter 1: General Information

### 1) Introduction:

The Wisconsin Department of Administration's (DOA) Division of Energy, Housing, and Community Resources (DEHCR) developed this handbook in partnership with the Department of Health Services (DHS) as a resource for Recovery Voucher Grant (RV) program. RV grantees are required to follow all state and federal requirements, policies, and procedures in this guide.

### 2) Program Overview:

Safe and stable housing is fundamental to helping people in recovery have more successful long-term outcomes and enabling providers to most effectively serve them. Recognizing this, DHS created the RV program, using a portion of the money received from settlements with opioid manufacturers and distributors, to provide an opportunity for people who have been diagnosed with opioid use disorder (OUD) to move into safe interim housing who otherwise would struggle to find housing due to limited housing options, financial or other barriers. DEHCR administers the program on behalf of DHS.

Recipients of this grant will become administrators of the RV grant program for their Continuum of Care (CoC)/Local Coalition (LC) service area. As administrators they will receive client referrals from their CoC/LC partners, enter clients into the program, and work with recovery residences to house them. Please note, recovery residences and agencies that have a recovery residence cannot apply due to the inherent conflict of interest created by being both the administrator (providing funding to recovery residences) and the recovery residence (receiving funding from the administrator). Exceptions to this, will be made on a case by case basis. If you are interested in an exception, please discuss with the RV Grant Specialist.

Each year several grants of up to \$100,000 each will be awarded based on a combination of the applicant's merit (determined by their application's score) and availability of funds. Applicants are encouraged to apply for the full award amount. Funds can be used to provide housing in DHS recognized recovery residences and to cover administrative costs. Administrative costs can be up to 10% of the award however applicants can also request less or none. The exact allocation between program funds (for vouchers), and administrative funds will be specified in each grantee's contract.

### 3) Eligible Applicants:

Eligible applicants are limited to agencies that have ALL of the following qualifications:

1. They agree to be an administrator of the RV grant program for their CoC/LC service area. This includes but isn't limited to accepting client referrals, entering clients into the program, and working with recovery residences to house them.
2. They are members of their HUD-recognized CoC/LC.
3. They have current direct experience delivering services to people experiencing homelessness.
4. They have an active HMIS subscription.
5. They are registered with SAM.gov and can show proof of non-debarment/no active exclusions.
6. There is a DHS recognized recovery residence within their service region.

\*\*Please note, recovery residences and agencies that have a recovery residence cannot apply due to the inherent conflict of interest, however exceptions will be made on a case by case basis. If you are interested in an exception, please discuss with the RV Grant Specialist.

Recovery Residence Definition: Per DHS ‘recovery residences are defined as home-like, residential environments that promote health recovery from a substance use disorder and support people recovering from a substance use disorder through use of peer recovery support.’ For more information on recovery residences please see [WI DHS Recovery Residence Description](#). Please see the [registry](#) for the most updated list. A chart showing the number of recovery residences and associated beds per county and CoC/LC updated as of August 2, 2022 is below:

Recovery Residences by CoC/Local Coalition			
CoC/Local Coalition	Counties Served with Recovery Residences	Number of Recovery Residences	Number of Beds
<b>Brown (BOS)</b>	Brown	4	31
<b>Central (BOS)</b>	Juneau	1	10
<b>Coulee (BOS)</b>	La Crosse	1	15
<b>Dairyland (BOS)</b>	Eau Claire	2	16
	Trempealeau	1	10
<b>Dane</b>	Dane	7	50
<b>East Central (BOS)</b>	Waushara	1	4
<b>Jefferson (BOS)</b>	Jefferson	1	8
<b>Lakeshore (BOS)</b>	Manitowoc	8	52
	Sheboygan	4	20
<b>Milwaukee</b>	Milwaukee	12	151
<b>North Central (BOS)</b>	Marathon	1	8
<b>NWISH (BOS)</b>	Langlade	1	8
<b>Racine</b>	Racine	1	10
<b>Rock/Walworth (BOS)</b>	Rock	1	7
<b>Southwest (BOS)</b>	Iowa	1	5
<b>Washington (BOS)</b>	Washington	1	7
<b>Waukesha (BOS)</b>	Waukesha	4	93
<b>West Central (BOS)</b>	Polk	2	16
	Saint Croix	4	29
<b>Winnebagoland (BOS)</b>	Winnebago	4	38

\*BOS stands for the Balance of State CoC.

Questions about recovery residences can be directed to the DHS Division of Quality Assurance (DQA) at [dhswebmaildqa@dhs.wisconsin.gov](mailto:dhswebmaildqa@dhs.wisconsin.gov).

## Chapter 2: Application Process & Grant Timeline

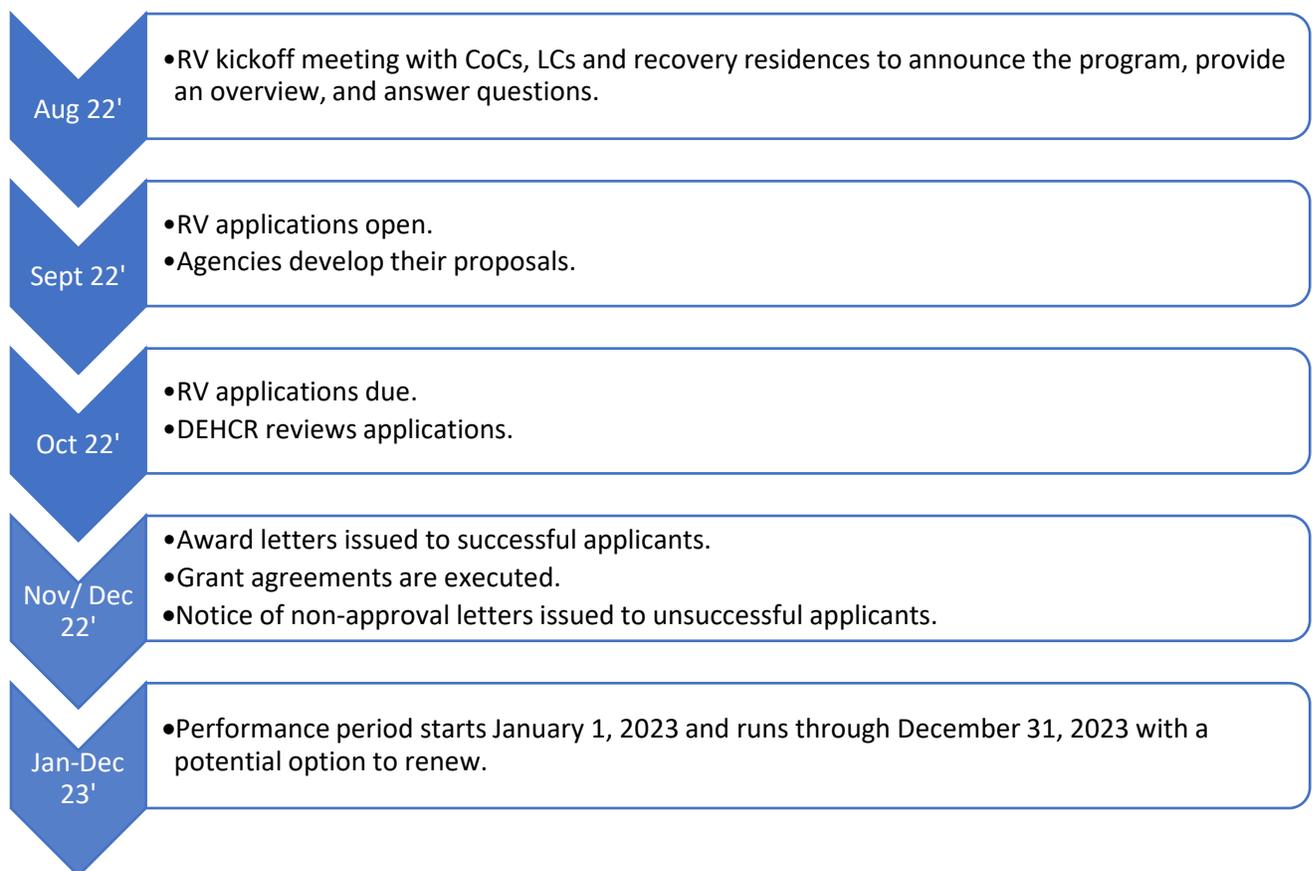
### 1) Overview:

DEHCR will post an application on their website ([DEHCR Housing Assistance \(wi.gov\)](https://www.dehcr.wi.gov)) inviting all interested applicants who meet the eligibility requirements to submit. Applicants will be given a set amount of time to develop their applications. After the submission deadline, a review team at DEHCR will score each application. The applications will be ranked, and the top scoring applications based on the scoring criteria will receive awards. DEHCR reserves the right to alter this process.

Typically, RV grants will be awarded annually, however if additional recovery residences are opened within a service area and there are available funds, agencies within the service area will be allowed to apply outside of the normal timeline. Please contact the Grants Specialist for additional information.

### 2) General Timeline:

The general timeline for the annual RV award process is as follows:



Please note DEHCR reserves the right to change timing with or without notice.

### Rights of the Applicant:

Each applicant whose proposal is reviewed by the grant review committee shall receive written notice of the determination of approval or non-approval of funding for their program.

The grant agreement will be executed upon signature of both parties.

## Chapter 3: Program Requirements

### 1) Client Eligibility:

Individuals are eligible to receive a recovery voucher if they are 18 and older and meet **both** the following criteria:

- 1) Documentation of OUD diagnosis or of receiving treatment to address OUD within the previous 12 months:

Eligibility documentation can be provided through one of the following options:

- a. Signed note from provider; or
- b. Record from a health care or behavioral health provider; or
- c. Claims statement that details OUD care/treatment was received; or
- d. Phone call with release of information from provider (note: requires signed consent from the client if the client is not on the phone call)

- 2) Documentation of Homelessness:

In order to be eligible, clients must also meet the HUD definitions for category 1, 2, or 4 homelessness as defined by 42 U.S. Code § 11302 part a) 1-5 and part (b) (Link: [42 USC Ch. 119: HOMELESS ASSISTANCE \(house.gov\)](#)). Below is the criteria for defining each eligible category of homelessness, and the associated documentation requirements. Please note category 3 homelessness is not an eligible definition for the RV program.

Category	Criteria	Documentation Requirements
Category 1: Literally Homeless	(1) Individual who lacks a fixed, regular, and adequate nighttime residence, meaning: <ol style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(ii) Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or</li> <li>(iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ol>	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Certification by the individual seeking assistance stating that (s)he was living on the streets or in shelter;</li> <li>• For Individuals exiting an institution – one of the forms of evidence above <u>and</u>:           <ul style="list-style-type: none"> <li>○ Discharge paperwork or written/oral referral, <u>or</u></li> <li>○ Written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited an institution</li> </ul> </li> </ul>
Category 2: Imminent Risk of Homelessness	(2) Individual who will imminently lose their primary nighttime residence, provided that: <ol style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> </ol>	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual that (s)he must leave; <u>or</u></li> </ul>

	<p>(ii) No subsequent residence has been identified; <u>and</u></p> <p>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</p>	<ul style="list-style-type: none"> <li>• For individuals leaving a hotel or motel – evidence that they lack the financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <u>and</u></li> <li>• Certification that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing</li> </ul>
<p>Category 4: Fleeing/Attempting to Flee Domestic Violence</p>	<p>(4) Any individual who:</p> <p>(i) Is fleeing, or is attempting to flee, domestic violence;</p> <p>(ii) Has no other residence; <u>and</u></p> <p>(iii) Lacks the resources or support networks to obtain other permanent housing</p>	<ul style="list-style-type: none"> <li>• Oral statement by the individual seeking assistance that they are fleeing. This statement is documented by self-certification or by the caseworker. Where the safety of the individual is not jeopardized, the oral statement must be verified; <u>and</u></li> <li>• Certification by the individual that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification, or other written documentation, that the individual lacks the financial resources and support networks to obtain other permanent housing.</li> </ul>

Source and link to downloadable PDF: [At a Glance Criteria and Recordkeeping Requirements for Definition of Homeless \(hudexchange.info\)](#) Please note, this document also contains information on category 3 homelessness which is not an eligible category under this program.

## 2) Client Applications & Pre-Screening:

Every client who enters the shelter or is referred to the agency must be asked if they meet the eligibility requirements for the RV grant. If they do, they should be asked if they are interested in the RV program and given an application to fill out. Client applications must be submitted in writing (either in-person or electronically) and must include all information required by the grantee to determine the client’s eligibility. Grantees may develop application forms that meet their specific needs.

Grantees may choose to use a shorter pre-screen form to place potentially eligible applicants on a waiting list. If an applicant is selected from the waiting list, they must then complete the full application form, which must include new/updated information to be used to determine final eligibility at the client’s point of entry into the RV program.

## 3) Waiting List Policy:

The demand for assistance may be greater than available resources. Grantees may choose to use a waiting list. If a waiting list is used, the grantee must establish a written Waiting List Policy which defines

how the waiting list is managed. The following is a non-exhaustive list of parameters grantees may use to organize their waiting lists:

- a. The order in which assistance is offered (i.e. preference selection policy based on aggregate needs, first come-first served, lottery, etc.);
- b. The length of time for utilizing the waiting list (i.e. maintaining the list for a fixed period of time, then starting over; accepting applications for a fixed period of time, then closing until all eligible applicants receive assistance; continuously accepting applications; etc.);
- c. The severity or intensity of each client's need

#### 4) Client Denial:

Clients who fill out the application for the RV program and then are determined to be ineligible based on the information provided in the application must be notified in writing. The written notice must identify why the applicant is ineligible. It must also inform the client that they have ten (10) calendar days from the date of notice to request a review of the decision. Reviews must be requested in writing to the grantee.

If the client is put on the waiting list after filling out the application for the RV program, this does not trigger the need to issue a formal denial letter.

#### 5) Overview of Eligible Activities & Reimbursable Costs:

Each RV grant is divided into two categories: program funds, and administrative funds.

##### 1) Program Funds for Recovery Residence Vouchers:

Program funds can be used to provide vouchers for a bed within a room in a DHS recognized recovery residence. Rooms typically have two (2) beds per room. Rooms with more or less beds than the standard two (2) per room can be reviewed and approved by the grantee on a case by case basis.

Consistent with other supportive housing programs, these vouchers can cover security deposits (if applicable; security deposit maximum is twice the monthly rent) and monthly rent. Rates charged to the RV grant program by the recovery residences must be consistent or less than rates charged for non-assisted beds (beds outside of the RV grant program) and under the RV Maximum Allowable Rate. The RV Maximum Allowable Rate is 135% of the Fair Market Rate (FMR) for Single-Room Occupancy (SRO) units within the area where the recovery residence is located. The FMR is defined each Fiscal Year (FY) by the Department of Housing and Urban Development (HUD) Office of Policy Development and Research. FMR information including rates can be found here: [Fair Market Rents \(40th PERCENTILE RENTS\) | HUD USER](#). The SRO unit rate is calculated as 75% of the FMR of an efficiency unit. To calculate the RV Maximum Allowable Rate for your area, follow the below formula:

$$\text{Efficiency FMR} * 75\% * 135\% = \text{RV Maximum Allowable Rate}$$

Exceptions to the RV Maximum Allowable Rate can be made by DEHCR on a case by case basis. Please contact the Grants Specialist if your agency is seeking an exception.

Clients can be supported with vouchers for up to 24-months, however each agency can decide whether their agency's tenure policy will be less than 24-months. These months do not need to be consecutive to qualify. Please note, if a security deposit is required it does not count towards the 24-month limit. Further, the grantee at their discretion can decide to extend a client's time beyond the initial 24-months based on the client's individual needs.

Vouchers are to be provided on a monthly basis and cannot be paid in advance (example: paying multiple months at once).

A bed may be held for a client that is a "no-show" for a maximum of 30 days if the recovery residence chooses to do so. If the end of the client's stay at the recovery residence or the end of the bed being held for the client is within the first 15 days of the month, the recovery residence is to return half the amount of that month's voucher. The RV grant program will only cover half the monthly cost of a recovery residence if the end of the client's term is within the first 15 days of the month.

## 2) Administrative Funds:

These funds can pay for administrative costs such as, but not limited to, the cost of office space, computers, office supplies, and salaries for agency wide functions such as accounting. Please note these costs will need to be prorated to reflect the percentage of the staff person's time or the percentage of the resource that is dedicated to the RV grant program.

Applicants can request up to 10% of their award be administrative funds but can also request less or none. The percentage allocation between program funds and administrative funds will be specified in the grantee's contract.

## 6) Non-Reimbursable Costs:

RV grant funds may not be spent on the following:

- a. The costs covering the last half of the month of a recovery residence stay if the client's term has ended within the first 15 days of the month.
- b. Costs for services at the recovery residences beyond the bed/room whether or not the services are provided by the recovery residence directly or through their third-party supplier.
- c. Case management expenses.
- d. Expenses incurred outside of the performance period.
- e. Capital expenditures.
- f. Alcoholic beverages.

- g. Items that could be construed as entertainment, including social activities and tickets to movies, shows, sports events, or concerts, and any costs related to attending such events, whether or not admission is charged.

If it is found the grantee used grant funds for any of the above outlined non-reimbursable items/activities, the grantee will be required to refund the dollars used for the non-reimbursable items/activities.

## Chapter 4: Administrative Requirements

### 1) Contractual Responsibility:

Grantees must commit to providing the services mutually agreed upon in the contracts. Grantees must provide all services directly, as well as maintain primary responsibility for all contractual issues, and administrative duties.

Contracting with a recovery residence to provide interim housing does not trigger the need for a subcontracting agreement.

### 2) Contract Amendments:

Grantees may amend their contracts only with written approval from DEHCR. To request a contract amendment, RV grantees are encouraged to consult with the Grant Specialist, then electronically submit:

1. A written request defining and justifying the changes being made. The request must be signed by someone with contract signature authority (digital signatures are accepted).
2. An amended budget if any changes are being made (Excel files preferred).

**DEHCR must receive all contract amendment requests no later than thirty (30) days before the end of the contract period.**

### 3) Homeless Management Information Systems (HMIS) Requirements:

The HMIS database is used to measure the scope of homelessness in Wisconsin, track service delivery and help evaluate the effectiveness of service interventions.

As a condition of funding, grantees are required to use the HMIS database to provide reporting on program participants. They will be required to have a specific program for the RV grant and to keep HMIS up to date. They must also commit to participating in applicable trainings throughout the contract period. DEHCR will monitor compliance and reserves the right to withhold payment if it is deemed client data is missing from HMIS.

### 4) Coordinated Entry:

Coordinated entry (CE) refers to a single place or process for people to access homelessness prevention, housing, and related services within a given Continuum of Care (CoC). HUD COCs are required to develop a system for CE. Grantees may use any applicable coordinated entry procedures or any other procedure to evaluate client eligibility for the RV program.

### 5) Recovery Residence Stay Agreements:

For each client placed in a recovery residence the grantee must sign an agreement with the recovery residence where the client will be staying. This agreement must include the following elements:

1. Outline of the costs including but not limited to the monthly rate, and security deposit (if applicable) and payment terms. The security deposit is to be returned to the grantee minus any applicable charges at the end of the client's stay. Statement that the rate charged is the same or less than the rate charged for beds not in the RV grant program.
2. Acknowledgement a bed may be held for a client that is a "no-show" for a maximum of 30 days if the recovery residence chooses to do so.
3. Statement that if the client's term ends within the first 15 days of the month, the recovery residence is to return half the amount of that month's voucher.
4. Requirement the recovery residence inform the grantee if there are any issues with the client to help prevent client being asked to leave the recovery residence. If the client is asked to leave the recovery residence that the grantee will be immediately informed (within 48 hours) and preferably before eviction/termination whenever possible.
5. Requirement the client be required by the recovery residence to sign a form attesting to the fact they have received the policies and procedures of the recovery residence including their termination policy. The recovery residence must share this signed form and a copy of their policies and procedures with the grantee.
6. Requirement the recovery residence share where the client is exiting to if known.
7. Encouragement the recovery residence follows best practices and not immediately evict someone if they relapse.

## 6) Required Client File Elements:

Each client file will be split into two parts, an electronic file kept in HMIS and a file for documents that will be kept outside of HMIS.

### 1) Non-HMIS Client File Elements:

Each client will have a file for documents and records that will be kept outside of HMIS. The following is a list of the critical elements:

1. Documentation of eligibility.
2. Documentation showing the bed rate at the recovery residence is below or at the RV Maximum Allowable Rate for the area where the recovery residence is located (see [Program Funds for Recovery Residence Vouchers](#) for more information) and the same or lower than non-assisted bed rates. If an exception to the RV Maximum Allowable Rate was made a copy of DEHCR's exception approval.
3. Recovery residence stay agreement (see [Recovery Residence Stay Agreement](#) section for more information).
4. Documentation of the amount and type of financial assistance provided to client.
5. Documentation of payments made to the recovery residence (example: ledger describing the service paid for, time period, check number and amount paid).
6. Signed certification by the client they received the grantee's recovery voucher program termination policy. If applicable, correspondence between the grantee and the client if the client was terminated.

7. Signed certification by the client they received the policies and procedures of the recovery residence including the recovery residence's termination policy. If applicable, correspondence between the recovery residence, grantee and the client if the client was terminated.

Please remove copies of social security cards, drivers' licenses, birth certificates when sharing client files with DEHCR. Copies of these documents should never be kept in client files.

## 2) HMIS Client File Elements:

An electronic file must be created in HMIS for each client containing the following elements:

### 1. Initial Assessment:

- a. Income and Sources
- b. Sociodemographic Information including but not limited to:
  - i. Previous living situation
  - ii. Age
  - iii. Disability Status
  - iv. Ethnicity
  - v. Gender
  - vi. Race

### 2. Participation in the Program:

- a. Entry and exit dates from the overall program (not dependent on whether the client is in a recovery residence)
- b. Specific recovery residence stay information:
  - i. County of recovery residence
  - ii. Address of the recovery residence (optional – not for reporting)
  - iii. Entry and exit dates from the recovery residence
- c. Reasons for exiting the RV grant program
- d. Exit destination

### 3. Reassessment Information:

To be completed every 12-months, from when the client was accepted into the program (not from when the client was housed in a recovery residence), including:

#### a. Opioid Use:

Question: In the past 12-months have you used any substances, other than those prescribed to you?

Answers: Yes, No

- i. If yes, follow up question: What substances have you used?

Answers (pick as many as apply):

1. Alcohol
2. Cocaine

3. Heroin
4. Marijuana
5. Methamphetamine
6. Prescription opioids not prescribed to you
7. Refused
8. Unsure/Don't Know

b. Income and Sources

## 7) Practices, Policies, Procedures & Documentation:

The following practices, policies, procedures and documentation of such are required of each grantee and may be reviewed during the application process and during monitoring. In this section we provide a description of the required elements of each.

### 1) Accessibility Practices/Resources:

Each grantee should have resources and practices in place to communicate with all potential beneficiaries including those with limited or no English. Further, facilities and programming should be accessible to people with disabilities including, but not limited to, people with vision loss, hearing loss, physical/mobility concerns, and learning disabilities.

### 2) Anti-Lobbying Requirements:

Each grantee is required to have a policy in place to ensure compliance with anti-lobbying requirements. RV funds may not be used to influence federal or state contracting, or federal or state financial transactions.

### 3) Client Termination Policy:

To terminate assistance to a client, the grantee must establish and follow their formal specific RV program termination process with the following requirements:

- Grantees must document the provision of the termination policy to the client.
- Grantees may terminate assistance if a client violates the rules of the program.
- Grantees must establish and follow a formal process that recognizes individual rights.
- Grantees must allow termination in only the most severe cases.
- Grantees must establish a formal process that includes a written notice to the client containing a clear statement of the reasons for termination, opportunity to have decision reviewed, in which the client is given the opportunity to present objections before a person other than the person who made or approved the termination decision and a prompt written notice of the final decision to the client.
- Grantees may provide assistance to a client who has been terminated from a program at a later date.

### 4) Confidential, Proprietary and Personally Identifiable Information Policy:

All grantees must develop and implement written procedures to ensure:

- All records containing personally identifying information of any person or family who applies for and/or receives assistance will be kept secure and confidential.

- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted will not be made public except with written authorization of the person responsible for the operation of the shelter.
- Grantees must develop and implement procedures to ensure the confidentiality of records pertaining to any person provided family violence prevention or treatment services under any project assisted, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.
- The use or disclosure by any party of any information concerning eligible individuals who receive services for any purpose not connected with the administration of the program is prohibited except with the informed, written consent of the eligible individual or the individual's legal guardian.
- If there is a disclosure of confidential information outside of the above guidelines the agency will notify the contracting or granting agency (DEHCR) within five (5) business days.

#### 5) Conflict of Interest Policy:

Grantees must have and comply with organizational, individual, and procurement conflict of interest policies.

##### *Organizational Conflict of Interest:*

Grantees must not condition RV assistance on a client's acceptance of housing or another good or service owned by the grantee, a parent or subsidiary of the grantee.

##### *Individual Conflict of Interest:*

The individual conflict of interest regulations prohibit financial gain for self, family, or those with business ties. No person who exercises responsibility over RV funded projects or who is in a position to participate in a decision-making process or gain inside information with regard to RV funded projects may:

- Obtain a financial interest or benefit from an assisted activity
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity
- Benefit from an assisted activity, either for themselves or for those with whom they have family or business ties, during their tenure or during the one-year period following their tenure

##### *Procurement Conflict of Interest:*

In the procurement of property and services, the conflict-of-interest provisions of 42 CFR §495.348 apply. These regulations require grantees to maintain written standards governing the performance of their employees engaged in awarding and administering contracts. At a minimum, these standards must:

- Require that no employee, officer, agent of the grantee shall participate in the selection, award, or administration of a contract supported by RV funds if their participation would create a real or apparent conflict of interest.

- Require that grantee employees, officers and agents not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.
- Stipulate provisions for penalties, sanctions, or other disciplinary actions for violations of standards.

Any grantee who violates the above will be required to repay any RV funds disbursed for which there is an identified conflict of interest unless an exception is granted by DEHCR.

#### 6) Drug Free Workplace Policy:

Each grantee is required to have a Drug Free Workplace Policy and procedures to carry out the policy. The policy must include that the contracting or granting agency (DEHCR) will be notified within ten (10) days after the grantee receives notice that a covered employee (an employee supported with RV funds) has been convicted of a criminal drug violation in the workplace.

#### 7) Equity Advancement & Culturally Responsive Practices:

Each grantee is expected to identify any differences between the population of BIPOC (Black, Indigenous, People of Color) in its service territory compared to the grantee's clients. If there are differences, strategies should be defined to help close the gap and be more culturally responsive to the populations identified in the analysis.

Further, DEHCR will begin to monitor grantees, during the 2023 grant year, for policies and procedures to ensure equal access to services regardless of sexual orientation, gender identity, family composition or marital status.

#### 8) Identification:

The Grantee cannot require third party documentation such as birth certificates or photo identification as a condition of immediately admitting an individual or family into emergency shelter or providing them with services.

#### 9) Involuntary Family Separation Rule:

The following rules apply to all grantees:

- All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marriage status identifying as a family must be served as a family by any project which serves families. There can be no involuntary separation.
- There can be no documentation requirement or need for "proof" of family, gender identification, and/or sexual orientation. Examples of prohibited inquiry and documentation include but are not limited to parentage, birth certificates, and marriage certificates.
- Families with children under age 18 must not be denied services based on the age of any child under age 18. For example, a family could not be denied assistance because there is a 16-year-old in the family.

#### 10) Non-Discrimination Policy for Clients & Employees:

Each grantee must have a policy expressing discrimination against clients and employees based on based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, physical condition, disability, age (40 or older) or genetic information (including family medical

history) is illegal and will not be tolerated. The policy should outline a way for clients and employees to report discrimination, and potential repercussions.

#### 11) No Required Faith Based Activities Or Religious Influence:

All RV funded activities must be administered in a manner that is free from religious influences and in accordance with the following principles.

- Grantees must not discriminate against any employee or applicant for employment and must not limit employment or give preference in employment to persons based on religion.
- Grantees must not discriminate against any person applying for shelter or services and must not limit shelter or services or give preference to persons based on religion.
- Grantees must provide no religious instruction or counseling, conduct no religious worship or services, engage in no religious proselytizing and exert no other religious influence in the provision of programs or services funded under the RV grant program.
  - If a grantee conducts these activities, the activities must be offered separately in time or location from the programs or services funded under the RV grant program, and participation must be voluntary for RV program participants.

#### 12) Process to Ensure Client Eligibility:

All grantees must have a process in place to screen clients to ensure eligibility.

#### 13) Prohibition on Conversion Therapy:

All agencies and programs are prohibited from using state funds for Conversion Therapy. Pursuant to 2021 Wisconsin Executive Order 122, use of state funds for conversion therapy is expressly disallowed. 'Conversion therapy' does not include: any practice or treatment that provides acceptance, support, or understanding to an individual, or any practice or treatment that facilitates an individual's coping, social support, or identity exploration and development, so long as such practices or treatments do not seek to change sexual orientation or gender identity; any practice or treatment that is neutral with regard to sexual orientation or gender identity and that seeks to prevent or address unlawful conduct or unsafe practices, or any practice or treatment that assists an individual seeking to undergo a gender transition or who is in the process of undergoing a gender transition.

#### 14) Prohibition on Tobacco Smoke:

The grantee and all grantee subcontractors must agree to comply with Public Law 103-227, also known as the Pro-Children Act of 2001, which prohibits tobacco smoke in any portion of a facility owned, leased, or granted for or by an entity that receives federal funds, either directly or through the state, for the purpose of providing services to children under the age of 18.

#### 15) Recordkeeping and Retention:

Grantees must retain all program files, financial documents, and records (including client files) for a minimum of six (6) years after the contract period ends. All files must be available for review or audit upon request from DEHCR, DHS or the Legislative Audit Bureau (LAB). Often the turnaround for file requests is short; therefore, files must be readily accessible so they can be provided to DEHCR, DHS or LAB within the timeframe requested.

#### 16) Recovery Residence Location:

If a client cannot be served at a recovery residence within the boundaries of the grantee's territory, the client may be served at a recovery residence outside of the grantee's territory if the client agrees. The client's recovery voucher may either be provided by original grantee, or the client can be referred to the grantee that is providing recovery vouchers for the territory the recovery residence is in.

#### 17) Recovery Residence Stay Agreements:

For each client placed in a recovery residence the grantee must sign an agreement with the recovery residence where the client will be staying. This agreement must include the following elements:

1. Outline of the costs including but not limited to the monthly rate, and security deposit (if applicable) and payment terms. The security deposit is to be returned to the grantee minus any applicable charges at the end of the client's stay. Statement that the rate charged is the same or less than the rate charged for beds not in the RV grant program.
2. Acknowledgement a bed may be held for a client that is a "no-show" for a maximum of 30 days if the recovery residence chooses to do so.
3. Statement that if the client's term ends within the first 15 days of the month, the recovery residence is to return half the amount of that month's voucher.
4. Requirement the recovery residence inform the grantee if there are any issues with the client to help prevent client being asked to leave the recovery residence. If the client is asked to leave the recovery residence that the grantee will be immediately informed (within 48 hours) and preferably before eviction/termination whenever possible.
5. Requirement the client be required by the recovery residence to sign a form attesting to the fact they have received the policies and procedures of the recovery residence including their termination policy. The recovery residence must share this signed form and a copy of their policies and procedures with the grantee.
6. Requirement the recovery residence share where the client is exiting to if known.
7. Encouragement the recovery residence follows best practices and not immediately evict someone if they relapse.

#### 18) Residency:

The grantee shall not require homeless individuals or families to be residents of the state or locality to receive shelter and support services, nor shall the grantee set differing allowed lengths of stay based on whether a homeless individual or family are residents of the state or locality.

#### 19) Signing Authority Documentation:

Each grantee must have documentation naming the person or persons who have signing authority for their organization.

#### 20) Trauma-Informed Care Practices:

Recognizing that many clients have experienced different types of trauma, each grantee is required to have trauma-informed care practices in place. Trauma-informed care practices are defined as an approach to intervention and providing services that focuses on how trauma may affect an individual's life and their response to receiving services in various systems. All grantees are expected to provide training to their staff on trauma-informed care practices.

## Chapter 5: Financial Management

### 1) Tracking of Funds:

All grantees must track each funding source from DEHCR separately. Each expenditure billed to the RV grant must have backup documentation that can be produced upon request. Payroll expenses should include documentation from timesheet to paycheck and should show allocation of hours by funding source. Please note, grantees are required to provide access to financial statements and expenditure records upon request by representatives of Department of Administration, Department of Health Services or the Legislative Audit Bureau.

### 2) Indirect Cost Allocation:

Indirect costs billed to the RV grant should follow standard accounting practices. Backup documentation supporting these costs should be able to be produced upon request.

### 3) Audit:

The grantee shall have a certified annual audit performed utilizing generally accepted accounting principles and generally accepted auditing standards.

If an audit is required by federal law and if the grantee is also the recipient of state funds under the same or a separate contract program, then the state funded programs shall also be included in the scope of the federally required audit.

Governmental and non-profit grantees, or their assignees, which received state funds during their fiscal year, shall comply with the requirements set forth in the State Single Audit Guidelines issued by the Department of Administration. Audit reports are due to the Department of Administration within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period.

For information on submission of the audit reporting package please see the [Department of Administration's Single Audit Compliance Supplement](#).

## Chapter 6: Payment Schedule, Process & Policy

### 1) Monthly Funds Disbursement & Quarterly Updates:

Grantees may draw on RV grant funds as reimbursement of expenditures. To initiate each payment, grantees must complete and submit a monthly RV grant payment request form on or before the fifteenth (15th) of the month following the close of the month prior. Please note client data in HMIS must be kept up to date and DEHCR reserves the right to withhold payment if it is deemed client data is missing from HMIS. Please see [Chapter 7: Reporting](#) for more information.

On the 15<sup>th</sup> of the month following the end of the quarter, grantees are required to provide a short quarterly update describing their expenditure of funds to date, and their expected future expenditure, including if they foresee any issues with spending the full amount awarded within the performance period. Grantees will be expected to provide a quarterly update until they have exhausted all funds.

Payment requests must be submitted by email to [DOADEHCRFiscal@wisconsin.gov](mailto:DOADEHCRFiscal@wisconsin.gov) copying the Grants Specialist. Spending updates should be sent directly to the Grants Specialist. DEHCR reserves the right to change all policies and timing described.

## 2) Final Payment Request & Close Out:

Grantees must submit their final payment request, financial close out report and update/complete all client files within HMIS within 15 days of the performance period end date or termination of the contract whichever comes earlier. If the payment request is not submitted and all client files are not updated/completed within HMIS within the specified timeframe, DEHCR reserves the right to decline the final reimbursement request. DEHCR reserves the right to change all policies and timing described.

## 3) Reallocation of Funds:

DEHCR will review funds expenditure on a quarterly basis at minimum. If a grantee is having a difficult time expending the funds or is quickly expending the funds, DEHCR will discuss the situation with the grantee to determine if a budget adjustment is warranted. If a budget adjustment is warranted, and there are available funds or the ability to recapture funds or reallocate returned funds to other grantees DEHCR will work with the grantee execute a budget adjustment. No budget adjustments will be made within 30 days of the end of the performance period.

## Chapter 7: Reporting

DEHCR and DHS will work with ICA to pull reporting directly from HMIS on a quarterly basis at minimum. Therefore, it is extremely important all information in HMIS is kept up to date. Please see [HMIS Client File Elements](#) for a list of the required elements to be kept in HMIS. Please note DEHCR and DHS reserve the right to change reporting requirements.

DEHCR and DHS will look at a variety metrics including but not limited to the following:

1. Number of people served in each eligible category of homelessness
2. Average number of days from when a client enters the RV program until recovery residence move-in
3. Number of people enrolled in the program without move-in
4. Average number of days clients stay in a recovery residence (while part of the program)
5. Percentage reoccurrence of homelessness for those exiting to permanent housing

## Chapter 8: Monitoring

DEHCR will monitor performance and requirements compliance at least annually. During the monitoring grantees should expect DEHCR to ask to see all of the documentation and proof of policies and

procedures as outlined in [Chapter 3: Program Requirements](#), [Chapter 4: Administrative Requirements](#), [Chapter 5: Financial Management](#) and [Chapter 7: Reporting](#). DEHCR will also begin to monitor grantees for policies and procedures to ensure equal access to services regardless of sexual orientation, gender identity, family composition or marital status. This is a new requirement. The monitoring can be either onsite or a desk monitoring. DEHCR reserves the right to change the monitoring requirements.

## Chapter 9: Resources

### 1) Questions?

Any questions regarding the application process or this grant can be directed to the Grants Specialist or [DOASupportiveHousing@wisconsin.gov](mailto:DOASupportiveHousing@wisconsin.gov).

Questions about recovery residences and the DHS Recovery Residence Registry can be directed to DHS's Division of Quality Assurance (DQA) at [dhswebmaildqa@dhs.wisconsin.gov](mailto:dhswebmaildqa@dhs.wisconsin.gov).

### 2) Links:

Information on the following topics can be found at the associated websites listed below:

- Opioids in Wisconsin: [Dose of Reality: Opioids in Wisconsin | Wisconsin Department of Health Services](#)
- Definition and description of DHS recognized recovery residences plus information on how to apply to be on the registry can be found here: [WI DHS Recovery Residence Description](#)
- DHS recognized recovery residence registry: [WI DHS Recovery Residence Registry](#)
- HUD definitions for category 1, 2, and 4 homelessness and their associated documentation requirements for confirming eligibility: [At a Glance Criteria and Recordkeeping Requirements for Definition of Homeless \(hudexchange.info\)](#)
  - Please note, this document also contains information on homeless category 3 which is not an eligible category under this program.
- Find your Continuum of Care (CoC)/Local Coalition (LC) based on your county:
  - Dane, Milwaukee, Racine: [Continuum of Care Contact Information in Wisconsin](#)
  - Balance of State (All Other Counties): [Balance of State Local Coalition Look Up](#)
- HUD Fair Market Rates (FMR): [Fair Market Rents \(40th PERCENTILE RENTS\) | HUD USER](#)
- RV Grant Program Website: [DEHCR Recovery Voucher Grant Program \(RV\) \(wi.gov\)](#)