

State of Wisconsin
Department of Administration
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2026 Annual Action Plan

State of Wisconsin ■ Tony Evers, Governor
Department of Administration ■ Kathy Blumenfeld, Secretary

OMB Control No: 2506-0117 (exp. 06/30/2018)

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

This *2026 Annual Action Plan*, referred to as the *Plan,* covers the second year of the 2025-2029 Consolidated Plan (April 1, 2026, through March 31, 2027). It represents the planning and application efforts by the State of Wisconsin to secure federal funds earmarked to meet the critical housing and community needs of the State's citizens.

The State of Wisconsin has been awarded a total of $42,453,616.82* in funding through five formula grant programs of the U.S. Department of Housing and Urban Development (HUD):

*HTF funds awarded separately.

- Small Cities Community Development Block Grants (CDBG)
- HOME Investment Partnerships (HOME)
- Emergency Solutions Grants (ESG)
- Housing Opportunities for Person with AIDS (HOPWA)
- Housing Trust Fund (HTF)

2. Summary of the objectives and outcomes identified in the Plan

Housing areas of special focus for this Plan include the promotion of residential rehabilitation, conversion and reconstruction; rental assistance; and assistance for people experiencing homelessness and homelessness prevention, with the priority given to households at the lowest income levels. Resources will be directed to projects that address the need for safe, decent, and affordable housing for a variety of populations. In addition, the state will award Housing Trust Funds to eligible recipients to construct and rehabilitate housing for extremely low-income families.

Funding projects that help support the infrastructure and public facilities of communities is another top priority of this Plan. Community development activities include the replacement or reconstruction of deteriorating infrastructure, the construction or rehabilitation of essential community facilities such as community centers, senior centers, and libraries and resiliency and promoting broadband internet access, as possible. Resources will be directed to projects that alleviate threats to public health, safety, or welfare, reduce slum and blight, or respond to an urgent local need.

Additionally, this Plan will focus on helping local governments assist businesses in creating and retaining jobs for individuals with low and moderate incomes. Economic development program resources will be directed to projects that create and expand economic opportunities in Wisconsin communities.

Highlighting these focus areas, the Division of Energy, Housing and Community Resources has identified five high priority needs and 14 goals. The high priority needs are:

- Affordable Housing: fund the construction and rehabilitation of affordable housing and provide rental and down payment assistance to lower income households and extremely low-income households.
- Homelessness: provide funding for emergency shelter, street outreach, prevention, and rapid re-housing.
- Special Needs Assistance: assist people experiencing homelessness, other special needs populations, and people with HIV/AIDS.
- Community Development: address community development needs such as the need for public facilities and planning grants.
- Economic Development: address economic development needs through economic development forgivable loans and job training.

The Division of Energy, Housing and Community Resource's 14 goals are:

- Rehabilitate Owner Occupied Housing
- Rehabilitate Rental Housing
- Convert Commercial or Public Buildings to Housing
- Build New Rental Housing
- Provide Down Payment Assistance for Homebuyers
- Provide Tenant-Based Rental Assistance for Low Income Households
- Provide Assistance to Those Experiencing Homelessness or at Risk of Homelessness
- Assist Communities with Public Facilities Projects
- Create and Retain Jobs through Economic Development Assistance and Job Training
- Increase Housing Options for Persons Living with HIV/AIDS
- Assist Communities with Emergency Assistance
- Assist Communities with Local Planning
- Special Projects
- Prevent, prepare for, and respond to coronavirus

These goals and expected outcomes can also be found in the *2026 Annual Action Plan: AP-20 Annual Goals and Objectives*.

3. Evaluation of past performance

The Division of Energy, Housing and Community Resources will continue to build upon the progress made over the past 5 years to increase the number of affordable and accessible housing units and to contribute to the economic sustainability of communities across the state. The Division will continue to support program activities which have proven to be effective while also looking for areas where the efficiency or impact of these programs can be improved.

Specific areas where the Division of Energy, Housing and Community Resources has made changes have been to increase funding and reduce barriers to the HOME-Tenant Based Rental Assistance (TBRA) program and to restructure the method of distribution of CDBG-Housing grants around a regional model. The Division's HOME-TBRA program targets low-income households. Clients served by the TBRA program are assisted in finding safe, affordable, and accessible housing.

The CDBG-Housing program has completed its tenth round of funding through a regional model of funds disbursement. The fair share regional model has improved the Division's CDBG-Housing program through both increasing administrative efficiencies and program impact. The regional model increases coordination and control at the local level and helps to ensure that funds are more evenly spread across the entire state.

As the Division moves into its next round of CDBG-Housing grants under the regional model it continues to seek input on ways this model can be strengthened and improved. The Division has provided opportunities for local Housing CDBG-Housing RLF's to return any unencumbered balance and dissolve the CDBG-Housing RLF. The Division will implement a new CDBG-Housing Conversion program utilizing grant funds as well as program income generated by local CDBG-Housing RLF's. Under the program, authorized under 24 CFR 570.202 (e), local CDBG-Housing RLF's will return all program income to the State. The State will award returned funds for eligible conversion projects to UGLG's utilizing these funds. All existing as well as future program income generated by local CDBG-Housing RLF's will be returned to the State and awarded for eligible CDBG Housing Conversion projects. The Division may continue to pursue strategies to consolidate or dissolve local CDBG-Housing RLF's, especially RLF's that have retained available balances over an extended period of time or have not made eligible awards with this balance.

The Division has also fully implemented the CDBG-CLOSE program. CDBG-CLOSE is designed to provide the necessary regulatory and financial flexibility for communities to address local needs. The Division, through the implementation of the CDBG-CLOSE program, has determined that the best course of action is to liquidate the remaining funding and to ultimately close all Economic Development Revolving Loan Funds (RLF). UGLG's that currently administer an Economic Development Revolving Loan Fund are required to participate in the CDBG-CLOSE program unless:

1. Capitalization of the RLF took place before January 1, 1992, and
2. The State has closed out the source grant from which funds were originally used to capitalize the RLF, and

3. HUD has closed out the CDBG grant between HUD and the State for the original source year that capitalized the RLF.

4. Summary of citizen participation process and consultation process

The Division of Energy, Housing and Community Resources consulted with public and private agencies when developing Wisconsin's 2025-2029 Consolidated Plan. The Division consulted with private and public housing providers, Continua of Care (CoC), homeless service providers, grantees, and government entities by attending conferences, conducting surveys, soliciting input via a Partner and Stakeholder Letter, and holding five public input sessions around the state as well as an online webinar.

The Division provided opportunities for the public to participate during the development of the 2025-2029 Wisconsin Consolidated Plan. Prior to developing the 2025-2029 Consolidated Plan, the Division of Energy, Housing and Community Resources conducted an online public survey, solicited and accepted general public comments, attended conferences, and held five public input sessions in various locations around the state. The Division's online public survey and online webinar format ensured that both rural and urban residents, as well as those who were unable to travel to the chosen locations, had the opportunity to offer feedback.

After development of a draft, and in accordance with its Citizen Participation Plan, (Appendix A: Citizen Participation Plan), the Department of Administration held a public hearing and made the *2026 Annual Action Plan* available for public review and comment for 30 days. Prior to its submission to HUD, The Department of Administration held a second hearing with the final version of the *2026 Annual Action Plan* available for public review and comment.

On April 22, 2026 and April 29, 2026, the Department posted a legal notice in the State's newspaper of record, the Wisconsin State Journal. The notice announced both the April 30, *2026 Annual Action Plan* public hearing and the availability of the draft *Plan* on the DOA website during the public comment period (April 30, 2026 – May 30, 2026).

On May 20, 2026 and May 27, 2026, the Department posted a legal notice in the State's newspaper of record, the Wisconsin State Journal. The notice announced both the June 3, *2026 Annual Action Plan* public hearing and the availability of the final *Plan* on the DOA website.

5. Summary of public comments

One public comment was received during the public comment period. No comments were received at the second hearing.

6. Summary of comments or views not accepted and the reasons for not accepting them

Not applicable.

7. Summary

The Division of Energy, Housing and Community Resources offers a broad range of financial and technical assistance to improve and expand housing, increase affordable housing opportunities, and provide services to people without housing. The variety of federal and state programs it manages benefits persons with disabilities, low- and moderate-income residents, and homeless populations. The Division partners with local governments, homeless service providers, developers, and housing organizations throughout the state to improve housing conditions for low- to moderate-income Wisconsin residents. It distributes over $40 million annually. In addition, DEHCR will make Housing Trust Fund awards to eligible recipients to construct and rehabilitate housing for extremely low-income families. It is anticipated that DEHCR will administer approximately $5 million in HTF funds per year.

CDBG-CLOSE is designed to provide the necessary regulatory and financial flexibility for communities to address local needs. The Department, through the implementation of the CDBG-CLOSE program, has determined that the best course of action is to liquidate the remaining funding and to ultimately close all CDBG-Economic Development Revolving Loan Funds (RLF). UGLG's that currently administer CDBG-Economic Development Revolving Loan Funds are required to participate in the CDBG-CLOSE program. Similarly, the Department has determined that the best course of action is to require all locally held CDBG-Housing Revolving Loan Funds (RLF) to remit all program income to the Department annually to capitalize CDBG-Conversion grants. Certain UGLG's that currently administer CDBG- Housing Revolving Loan Funds are required to annually remit program income to the Department.

It is the Division of Energy, Housing and Community Resource's mission to assist Wisconsin governments, businesses, and non-profit agencies in building and sustaining quality communities. This mission is accomplished through the creation of economic opportunities, facilitation of local solutions to infrastructure issues, access to affordable housing and related services, addressing resiliency and promoting broadband internet access and creating and retaining jobs, especially for low- and moderate-income persons.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator		WI Dept of Administration, DEHCR
HOPWA Administrator		WI Dept of Administration, DEHCR
HOME Administrator		WI Dept of Administration, DEHCR
ESG Administrator		WI Dept of Administration, DEHCR
HTF Administrator		WI Dept of Administration, DEHCR

Table 1 – Responsible Agencies

Narrative

The 2025-2029 Consolidated Plan was developed by the Wisconsin Department of Administration's Division of Energy, Housing and Community Resources.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

The Division of Energy, Housing and Community Resources consulted with public and private agencies when developing Wisconsin's 2025-2029 Consolidated Plan. The Division consulted with private and public housing providers, Continua of Care (CoC), homeless service providers, grantees, and government entities by attending conferences, conducting surveys, soliciting input via a Partner and Stakeholder Letter, and holding five public input sessions around the state as well as an online webinar.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

DEHCR reached out to multiple partners and stakeholders at the state, local, private, and nonprofit level for input on specific evidence-based program modifications or new initiatives that could enable the Division to better meet the needs of citizens. Feedback was sought regarding the funding prioritization of local housing, community, and economic development needs. DEHCR received input on its Plan from the Wisconsin Dept. of Health Services, The Balance of State Continuum of Care and Dane County Continuum of Care to improve service delivery and persons served. DEHCR received input on its Plan from the WI Public Service Corporation on improving access to broadband internet in underserved areas of WI. DEHCR sought input on its Plan regarding the vulnerability of housing occupied by low-and moderate-income households to natural hazard risks from the WI Dept. of Military Affairs, Division of Emergency Management.

DEHCR conducted an online public survey in order to gauge the needs and priorities of WI citizens. The survey was open from July 2nd – October 4, 2024. It was taken by 131 respondents, though not every respondent answered every question. The needs and priorities outlined in the survey informed the Needs Assessment and Market Analysis and helped DEHCR set appropriate goals in the Strategic Plan and Annual Action Plan. The online public survey was available in English, Spanish and Hmong, the survey was also made available in other formats upon request.

DEHCR attended the 2025 "A Home for Everyone Conference". The conference had approximately 250 attendees and was held on August 13-14, 2025 in Wisconsin Dells, WI. DEHCR conversed with attendees and solicited input on its HUD-funded as well as State funded programs, award requirements, identified changes, potential updates and solicited input regarding the 2026 Annual Action Plan.

DEHCR attended the 2025 Poverty Matters! Conference. The conference was held on October 1-2, 2025 in Wisconsin Dells, WI. The Poverty Matters! Conference is committed to reducing poverty in communities in Wisconsin. DEHCR led multiple panel sessions which informed the Division on statewide housing issues and how the Division's programs could assist. DEHCR discussed program goals, participation requirements and allowable activities for multiple federal and state-funded programs and solicited input regarding the 2026 Annual Action Plan.

DEHCR conducted a Public Housing Survey which was sent to the 120 WI Public Housing Authorities. The survey was open from June 22nd, 2024 – October 4, 2024 and had 18 respondents (not all respondents answered every question). The Public Housing Survey was made available in other formats, or translated, upon request.

DEHCR held five Public Input Sessions and an online webinar throughout the state. All locations for the Public Input Sessions had accessibility features and were open to the public. The online webinar was recorded and available on DEHCR website for those who were unable to attend any of the Public Input Sessions but still wanted to provide their input.

Public Notices informing communities of the Public Input Sessions were published in the State's newspaper of record, the Wisconsin State Journal and were published on-line on the State's Public Meeting Notices webpage. Information about the Public Input Sessions was emailed to relevant state stakeholders. Accommodations, such as translation/interpretation services for non-English speakers, or for persons with disabilities, for the sessions were available upon request and all sessions were held at accessible venues.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Division of Energy, Housing and Community Resources' Administrator and Bureau of Housing staff regularly attend Wisconsin CoC meetings and work closely with CoC staff to administer DEHCR programs. DEHCR attended each of the Wisconsin Balance of State Continuum of Care (WIBOSCOC) Quarterly meetings held in 2023. WIBOSCOC is a 501(c)3 non-profit organization serving all the counties in Wisconsin, except Dane, Milwaukee, and Racine. Participants were asked for their feedback, and were encouraged to communicate their thoughts about our 2026 Annual Action Plan. DEHCR recognizes how the means of service delivery and the extent of homelessness differs across Wisconsin. The Division contracts with regional groupings of agencies (referred to as local continua) to administer the ESG program.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Information regarding the Division of Energy, Housing and Community Resources consultation with Wisconsin's CoCs is provided above. The Division's Administrator and ESG staff regularly attend Wisconsin CoC meetings and work closely with CoCs to administer the ESG program. Division staff continue to work with CoCs to allocate resources equitably across CoC boundaries and have ongoing discussions around how to update and improve the allocation formula. DEHCR also has routine

meetings with the Institute for Community Alliances, Wisconsin's HMIS provider, regarding reporting, funding, policies and administration.

2. Describe Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Madison/Dane County Continuum of Care
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
2	**Agency/Group/Organization**	Milwaukee County Continuum of Care
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-Homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
3	**Agency/Group/Organization**	Racine County Continuum of Care
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.

4	**Agency/Group/Organization**	Balance of State Continuum of Care
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
5	**Agency/Group/Organization**	Center on Wisconsin Strategy (COWS)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
6	**Agency/Group/Organization**	Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP)
	Agency/Group/Organization Type	Other government - State

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
7	**Agency/Group/Organization**	Wisconsin Department of Child and Family Services (DCF)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
8	**Agency/Group/Organization**	Wisconsin Department of Financial Institutions (DFI)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
9	**Agency/Group/Organization**	Wisconsin Department of Health Services (DHS)
	Agency/Group/Organization Type	Other government - State

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
10	**Agency/Group/Organization**	Wisconsin Department of Natural Resources (DNR)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
11	**Agency/Group/Organization**	Wisconsin Department of Administration's Division of Intergovernmental Relations
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
12	**Agency/Group/Organization**	Wisconsin Department of Corrections (DOC)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
13	**Agency/Group/Organization**	Wisconsin Department of Transportation (DOT)
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
14	**Agency/Group/Organization**	Wisconsin Department of Public Instruction (DPI)
	Agency/Group/Organization Type	Other government – State Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
15	**Agency/Group/Organization**	Wisconsin Department of Veterans Affairs (WDVA)
	Agency/Group/Organization Type	Other Government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Veterans Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
16	**Agency/Group/Organization**	Wisconsin Department of Workforce Development (DWD)
	Agency/Group/Organization Type	Service-Fair Housing Other Government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.

17	**Agency/Group/Organization**	Wisconsin Housing and Economic Development Association (WHEDA)
	Agency/Group/Organization Type	Housing Services - Housing Quasi-governmental
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
18	**Agency/Group/Organization**	Wisconsin Department of Military Affairs (DMA)
	Agency/Group/Organization Type	Agency – Emergency Management Other Government – State Resiliency/Climate Change
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
19	**Agency/Group/Organization**	Wisconsin Public Service Corporation (PSC)
	Agency/Group/Organization Type	Services - Narrowing the Digital Divide Other Government - State

	What section of the Plan was addressed by Consultation?	Broadband Internet Expansion Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
20	**Agency/Group/Organization**	Wisconsin Community Action Program Association (WISCAP)
	Agency/Group/Organization Type	Services - Housing Regional organization Planning organization Community Action Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
21	**Agency/Group/Organization**	Vivent Health
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.

22	**Agency/Group/Organization**	Wisconsin Interagency Council on Homelessness
	Agency/Group/Organization Type	Interagency Council
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sought feedback at quarterly meetings. Improved service delivery.
23	**Agency/Group/Organization**	Economic Development Corporations
	Agency/Group/Organization Type	Services-Employment Regional organization Planning organization Business Leaders Economic Development Corporations
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sought feedback at Wisconsin Economic Development Corporation Economic Development Summits.
24	**Agency/Group/Organization**	Legal Action of Wisconsin
	Agency/Group/Organization Type	Services - Housing Services – Fair Housing Services - Victims of Domestic Violence

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.
25	**Agency/Group/Organization**	Wisconsin Association of Housing Authorities
	Agency/Group/Organization Type	Public Housing Authority Services - Housing Services – Fair Housing Services - Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email/Letter. Improved service delivery.

Identify any Agency Types not consulted and provide rationale for not consulting

The Division of Energy, Housing and Community Resources consulted all relevant agencies.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Balance of State CoC	Assist those experiencing homelessness and decrease the number of people experiencing homelessness.
WHEDA Qualified Allocation Plan (QAP)	WHEDA	Assist those in need of safe, quality, affordable rental housing in Wisconsin. Support housing goals and objectives to decrease the number of people experiencing a housing cost burden and homelessness.
Wisconsin Interagency Council on Homelessness 2021-2023 Statewide Action Plan	Wisconsin Interagency Council on Homelessness	Assist those experiencing homelessness and decrease the number of people experiencing homelessness.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

The Division of Energy, Housing and Community Resources encouraged units of local government (UGLGs) to participate in the development of the Consolidated Plan. DEHCR sent email notifications to 1,900 units of local government, informing them of the online public survey and public input sessions, and encouraging them to submit feedback if they were unable to take the survey or attend the input sessions. DEHCR staff also solicited feedback from local government staff and local economic development corporation staff at the Wisconsin Economic Development Association's Governor's Conference on Economic Development held on February 2nd to February 7th, 2025 held in Milwaukee, WI. The Summit provides an opportunity to address the unique challenges and opportunities of blending community and economic development efforts to advance social outcomes. Participants included state and local government, tribal representatives, business owners, and others.

Narrative (optional):

AP-12 Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting

DEHCR developed the 2025-2029 WI Consolidated Plan in accordance with its Citizen Participation Plan. DEHCR conducted an online public survey, solicited and accepted public comments, attended A Home for Everyone Conference, and held 5 public input sessions across WI. DEHCR's online survey and webinar ensured that rural and urban communities as well as those who were unable to travel to the on-site locations, could offer feedback.

DEHCR conducted an online survey to gauge the needs and priorities of Wisconsin citizens. The survey was open from July 2 – October 4, 2024. 131 respondents to the survey; however, not every respondent answered every question. The needs and priorities from the survey informed the Needs Assessment and Market Analysis and set goals in the Strategic Plan and Annual Action Plan. The online survey was available in English, Spanish, and Hmong with other formats available upon request. DEHCR made arrangements to enable people with disabilities to access the survey, as necessary. The results can be found in Appendix B. DEHCR also surveyed Public Housing Agencies regarding their facilities, needs and to identify ways in which we can work collaboratively together.

DEHCR solicited public comments by posting on the Division's website and accepted emailed comments. DEHCR read, responded to, and recorded every email received. As possible, DEHCR incorporated public comments into the 2025-2029 Consolidated Plan.

DEHCR attended the 2024 "A Home for Everyone Conference" on July 17-18, 2024 in Madison, WI. Approximately 250 persons attended. DEHCR conversed with attendees and solicited input on its HUD-funded as well as State funded programs, award requirements, identified changes, potential updates and solicited input regarding the 2020-2024 Consolidated Plan.

DEHCR held 5 Public Input Sessions and an online webinar. All locations for the Public Input Sessions had accessibility features and were open to the public. Locations were chosen spatially around WI. The online webinar was recorded and available on DEHCR's website for those who were unable to attend any of the Public Input Sessions in-person.

Public Notices informing communities of the Public Input Sessions were published in the State's newspaper of record, the Wisconsin State Journal and the Wisconsin Public Meeting Notices webpage. Information about the Public Input Sessions was emailed to state stakeholders.

Accommodations, such as translation/interpretation services for non-English speakers or for persons with disabilities, for the Public Input Sessions were available upon request and all Public Input Sessions were held at accessible venues.

On April 22, 2026 and April 29, 2026, the Department posted a legal notice in the State's newspaper of record, the Wisconsin State Journal. The notice announced both the April 30, 2026: *2026 Annual Action Plan* public hearing and the availability of the draft *2026 Annual Action Plan* on the DOA website during the public comment period (April 30, 2026 – May 30, 2026).

After development, DEHCR held an in-person public hearing with telephonic option and a 30-day public comment period. All comments received were evaluated for incorporation into the final Plan.

Once the public comment period closed, DEHCR held a second public hearing to announce the final Plan which incorporated any comments received or updates once final data became available. On May 20, 2026 and May 27, 2026, the Department posted a legal notice in the State's newspaper of record, the Wisconsin State Journal. The notice announced both the June 3, 2026: *2026 Annual Action Plan* public hearing and the availability of the final *2026 Annual Action Plan* on the DOA website.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Input Session, Menomonie, WI	Northwest Wisconsin	2 attendees	See Appendix	N/A	
2	Public Input Session, Crandon, WI	Northeast Wisconsin	0 attendees	See Appendix	N/A	
3	Public Input Session, Stevens Point, WI	Central Wisconsin	1 Attendee	See Appendix	N/A	
4	Public Input Session, Platteville, WI	Southwest Wisconsin	0 Attendees	See Appendix	N/A	
5	Public Input Session, Madison, WI	Statewide Wisconsin, Broad outreach, Wisconsin citizens	In person: 0 Attendees, Online: 4 Registered	See Appendix	N/A	
6	Public Input Session, Survey	Broad outreach, Wisconsin Stakeholders and Citizens	131 Respondents	See Appendix	N/A	
7	Public Input Session, multiple conferences	Wisconsin Stakeholders	Approximately 500 Attendees	See Appendix	N/A	
8	Public Hearing	Broad outreach	In person: 0 1 comment received	See Appendix	See Appendix	

9	Public Hearing	Broad outreach	In person: 0	See Appendix	See Appendix	

Table 4 – Citizen Participation Outreach

Annual Action Plan

AP-15 Expected Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

Anticipated Resources

Table 52 - Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	27,381,698	16,136,191	14,359,960	57,877,849	82,145,094	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	10,256,500.82	5,271,481	23,156,109	38,684,090.82	30,769,502	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,224,489	0	0	1,224,489	3,673,467	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,590,929	0	0	3,590,929	10,772,787	
Housing Trust Fund	public - federal	Admin and Planning Multifamily rental new construction Multifamily rental rehab	Not available at this time	Not available at this time	6,723,736	Not available at this time	13,183,542	DEHCR will make awards to eligible to construct and rehabilitate hous extremely low-income families uti funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
Other	public - federal	Acquisition Admin and Planning Economic Development Homeowner rehab Housing Multifamily rental new construction New construction for ownership Public Improvements Short term or transitional housing facilities	0	0	0	0	0	
Other	public - federal	Acquisition Admin and Planning Economic Development Multifamily rental rehab Other	0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG-DR	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Homeowner rehab Multifamily rental rehab	0	0	$15,355,000	$15,355,000	$0	
Other	FY2020 ESG-CV	Prevent, prepare for, and respond to coronavirus	0	0	0	0	$0	
Other	FY2020 CDBG-CV	Prevent, prepare for, and respond to coronavirus	0	0	$44,006,396	$44,006,396	$0	
Other	FY2020 HOPWA-CV	Prevent, prepare for, and respond to coronavirus	0	0	0	0	$0	

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG Economic Development funding is often used as gap financing, allowing it to leverage other sources of funds at the local level. CDBG Planning, and Public Facilities for Economic Development have a 50% match requirement. The requirement to provide matching funds for Planning awards is waived for projects focusing on broadband internet expansion. This requirement is often satisfied using funds from local government and other state or federal agencies.

HOME funding may also be used to leverage other funding. The 25% match requirement for the HOME programs is met through a combination of private financing, cash contributions, investments from state and local government sources, and donated land, materials, services, and labor. The Division of Energy, Housing and Community Resources administers the Housing Cost Reduction Initiative, which is also used to fund affordable housing programs.

The 100% ESG match requirement is met through use of state homeless funds, federal and state programs, local government contributions, cash donations, and donated materials, services, and labor. State funds used to end homelessness include the Homeless Prevention Program, Housing Assistance Program, State Shelter Subsidy Grants, and Critical Assistance program.

HOPWA formula grants do not have matching requirements.

HTF funds prior to PY 2025 are administered by the Wisconsin Housing and Economic Development Authority. No match is required by WHEDA; however, additional points are provided to applicants based on non-federal funds applied to the project. Beginning in PY 2025, DEHCR will assume administrative responsibilities for the HTF.

If appropriate, describe publicly owned land or property located within the state that may be used to address the needs identified in the plan

Not applicable.

Discussion

The Division of Energy, Housing and Community Resources coordinates with the Wisconsin Housing and Economic Development Authority (WHEDA), the administrator of the Low-income Housing Tax Credits, in regard to affordable housing resources. Members of WHEDA's staff provide advice to DEHCR's Rental Housing Development (RHD) program. In addition, DEHCR will make HTF awards to eligible recipients to construct and rehabilitate housing for extremely low-income families.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitate Owner Occupied Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: $7,100,471 HOME: $4,729,044	Homeowner Housing Rehabilitated: 322 Household Housing Unit
2	Rehabilitate Rental Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: $81,844 HOME: $3,401,777 Housing Trust Fund: $1,344,747	Rental units rehabilitated: 111* Household Housing Unit *Does not include PY26 HTF funds.
3	Build New Rental Housing	2025	2029	Affordable Housing		Affordable Housing	HOME: $6,803,555 Housing Trust Fund: $5,378,989	Rental units constructed: 235* Household Housing Unit *Does not include PY26 HTF funds.
4	Convert Commercial or Public Buildings to Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: $16,085,094	Rental units converted: 161 Household Housing Units
5	Provide Down Payment Assistance to Homebuyers	2025	2029	Affordable Housing		Affordable Housing	CDBG: $542,253 HOME: $6,530,585	Direct Financial Assistance to Homebuyers: 293 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Tenant-Based Rental Assistance	2025	2029	Affordable Housing		Affordable Housing Homelessness Special Needs Assistance	HOME: $16,193,480	Tenant-based rental assistance / Rapid Rehousing: 2,846 Households Assisted
7	Provide Homeless Assistance	2025	2029	Homeless		Homelessness	ESG: $3,590,929	Tenant-based rental assistance / Rapid Rehousing: 1,638 Households Assisted Homeless Person Overnight Shelter: 14,000 Persons Assisted Homelessness Prevention: 4,000 Persons Assisted Other: 1,000 Other
8	Assist Communities with Public Facilities Projects	2025	2029	Non-Housing Community Development		Community Development	CDBG: $27,854,686	Public Facility or Infrastructure Activities other than Low/Moderate-income Housing Benefit: 83,564 Persons Assisted
9	Create Jobs Through ED Assistance and Job Training	2025	2029	Non-Housing Community Development		Economic Development	CDBG: $1,323,012	Jobs created/retained: 38 Jobs

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Increase Housing Options for Persons with HIV/AIDS	2025	2029	Non-Homeless Special Needs		Special Needs Assistance	HOPWA: $1,224,489	Tenant-based rental assistance / Rapid Rehousing: 159 Households Assisted
11	Assist Communities with Emergency Assistance	2025	2029	Affordable Housing Community Development		Affordable Housing Community Development	CDBG: $2,116,820 CDBG-DR: $15,355,000	Public Facility or Infrastructure Activities and Low/Moderate-income Housing Benefit: 51 Persons Assisted
12	Assist Communities with Local Planning	2025	2029	Non-Housing Community Development		Community Development	CDBG: $264,602	Other: 11 Other
13	Special Projects	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Affordable Housing Community Development Economic Development Homelessness Special Needs Assistance	CDBG: $1,587,615	Other: 1 Other
14	Prevent, prepare for, and respond to coronavirus	2025	2029	Prevent, prepare for, and respond to coronavirus		Prevent, prepare for, and respond to coronavirus	CDBG-CV: $44,006,396	Other: 1 Other

Table 55 – Goals Summary

Goal Descriptions

1	**Goal Name**	Rehabilitate Owner Occupied Housing
	Goal Description	The Division of Energy, Housing and Community Resources will provide funds to rehabilitate owner occupied housing thorough its HOME and CDBG programs.
2	**Goal Name**	Rehabilitate Rental Housing
	Goal Description	The Division of Energy, Housing and Community Resources will provide funds to rehabilitate rental housing through its HOME and CDBG programs. In addition, DEHCR will make HTF awards to eligible recipients to rehabilitate rental housing for extremely low-income families. DEHCR projects that HTF funds will rehabilitate approximately 32 rental units per year equaling a total of 162 for the duration of the Plan at current funding levels.
3	**Goal Name**	Build New Rental Housing
	Goal Description	The Division of Energy, Housing and Community Resources will provide funds to build new rental housing through its HOME program. In addition, DEHCR will make HTF awards to eligible recipients to construct new rental housing for extremely low-income families. DEHCR projects that HTF funds will construct approximately 65 new rental units per year equaling a total of 324 for the duration of the Plan at current funding levels.
4	**Goal Name**	Convert Commercial or Public Buildings to Housing
	Goal Description	Under the program, authorized under 24 CFR 570.202 (e), local CDBG-Housing RLF's will return all program income to the State. The State will award returned funds for eligible conversion projects to UGLG's utilizing these funds. All existing as well as future program income generated by local CDBG-Housing RLF's will be returned to the State and awarded for eligible CDBG Housing Conversion projects.
5	**Goal Name**	Provide Down Payment Assistance to Homebuyers
	Goal Description	The Division of Energy, Housing and Community Resources will provide down payment assistance to homebuyers through its CDBG and HOME programs.
6	**Goal Name**	Provide Tenant-Based Rental Assistance
	Goal Description	The Division of Energy, Housing and Community Resources will provide Tenant-Based Rental Assistance (TBRA) to homeless persons and families. DEHCR will also assist persons or families with special needs through its HOME TBRA program.

7	**Goal Name**	Provide Homeless Assistance
	Goal Description	The Division of Energy, Housing and Community Resources will provide assistance to those experiencing homelessness or at risk of homelessness through its ESG program. The "other" goal outcome indicator refers to the number of persons assisted with street outreach.
8	**Goal Name**	Assist Communities with Public Facilities Projects
	Goal Description	The Division of Energy, Housing and Community Resources will assist communities with public facilities projects using CDBG funding.
9	**Goal Name**	Create Jobs Through ED Assistance and Job Training
	Goal Description	The Division of Energy, Housing and Community Resources will create jobs through economic development assistance and job training using CDBG funding.
10	**Goal Name**	Increase Housing Options for Persons with HIV/AIDS
	Goal Description	The Division of Energy, Housing and Community Resources will increase housing options for persons living with HIV/AIDS through its HOPWA program.
11	**Goal Name**	Assist Communities with Emergency Assistance
	Goal Description	The Division of Energy, Housing and Community Resources will provide emergency assistance to communities to assist low- and moderate-income residents recover from a disaster.
12	**Goal Name**	Assist Communities with Local Planning
	Goal Description	The Division of Energy, Housing and Community Resources will assist communities with local planning using CDBG funds. The "other" goal outcome indicator refers to the number of communities assisted.
13	**Goal Name**	Special Projects
	Goal Description	The Division of Energy, Housing and Community Resources will fund special projects as needs arise throughout the state. These projects may be pilot-type projects or may be new activities that the state has not funded in the past. The "other" goal outcome indicator refers to the number of special projects undertaken.
14	**Goal Name**	Prevent, prepare for, and respond to coronavirus

	Goal Description	Prevent, prepare for, and respond to coronavirus

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

It is difficult to determine the number of extremely low-income, low-income and moderate-income families who will be served with HOME funds; however, based on the goals listed above there will be 111 households assisted with new housing opportunities, 433 households assisted with rehabilitation, 293 households provided with down payment assistance and 2,846 households assisted with tenant based rental assistance.

In addition, DEHCR will make Housing Trust Fund awards to eligible recipients to rehabilitate and construct new rental housing for extremely low-income families. DEHCR projects that HTF funds will rehabilitate approximately __ rental units per year equaling a total of __ for the duration of the Plan at current funding levels. DEHCR projects that HTF funds will construct approximately __ new rental units per year equaling a total of __ for the duration of the Plan at current funding levels.

*Final HTF numbers TBD.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The Division of Energy, Housing and Community Resources' funding allocation priorities for the federal formula grant programs of CDBG, HOME, HOPWA, HTF and ESG are outlined in the table below. The percentage of funds allocated is shown by program type and the associated goal (see previous discussion of goals in SP-45 and AP-20).

As only whole numbers are allowed, there may be a small amount of rounding error in the estimates.

Funding Allocation Priorities

	Rehabilitate Owner Occupied Housing (%)	Rehabilitate Rental Housing (%)	Build New Rental Housing Includes Conversion (%)	Provide Down Payment Assistance to Homebuyers (%)	Provide Tenant-Based Rental Assistance (%)	Provide Homeless Assistance (%)	Assist Communities with Public Facilities Projects (%)	Create Jobs Through ED Assistance and Job Training (%)	Increase Housing Options for Persons with HIV/AIDS (%)	Assist Communities with Emergency Assistance (%)	Assist Communities with Local Planning (%)	Special Projects (%)
CDBG	13%	0%	28%	2%	0	0	48%	2%	0	4%	0%	3%
HOME	11%	8%	21%	15%	45%	0	0	0	0	0	0	0%
HOPWA	0	0	0	0	0	0	0	0	100	0	0	0
ESG	0	0	0	0	0	100	0	0	0	0	0	0
HTF	0	20%	80%	0	0	0	0	0	0	0	0	0
Other CDBG-DR	0	0	0	0	0	0	0	0	0	100	0	0

Table 58 – Funding Allocation Priorities

Reason for Allocation Priorities

The allocation priorities shown above are a reflection of the needs of the state and the restrictions of the programs. The Needs Assessment and Market Analysis showed a statewide need for affordable housing, homeless and special needs assistance, and community and economic development. Each of these priorities is addressed by the allocation and is addressed by the program and funding type best suited to respond to the needs of the state. Funds contained in housing revolving loan funds may be used for owner occupied rehabilitation, rental rehabilitation, security deposits for those at risk of homelessness or experiencing homelessness, or down payment assistance. Therefore, an estimated $20,359,612 of CDBG funding used to further housing related goals will be collected by local housing revolving loan funds.

All Economic Development Revolving Loan Fund Accounts that were originally capitalized with payments of loans made from CDBG grant funds awarded prior to January 1, 1992 by the State of Wisconsin **and** have not received a subsequent award from January 1, 1992 to present from the State of Wisconsin are not subject to CDBG-CLOSE. These funds qualify under the program income reporting guidelines as defined in CPD Notice 04-11.

The State's implementation of CDBG-CLOSE includes its interpretation of "maximum extent possible" as contained in 24 CFR 570.489(e)(3)(i). DEHCR has identified two significant feasibility problems regarding administering the CDBG-CLOSE program while adhering absolutely to distributing any and all program income before drawing grant funds. The first problem occurs when UGLGs request funds under open awards for other State CDBG Programs. The program income would displace and offset the committed grant funds. As the State's accounting system is grant-specific, this issue would require the modification and execution of potentially hundreds of additional award contracts from the same overall number of activities and dollar amounts.

The second problem is that using program income ahead of grant funds in such absolute terms disrupts the State's ability to plan for and ensure basic compliance with regulatory expenditure limitations on certain activity types, including overall low- and moderate-income (LMI) benefit, the public service cap, and the planning and administration cost cap. The State has legitimate concerns about its ability to comply with these limitations if grant funds are budgeted within the regulatory limitations, and those grant funds are later displaced by program income based solely on availability without regard for activity type.

Based on these expressed concerns, it is not possible or practical for the State to easily or conveniently adhere absolutely to distributing any and all program income before drawing grant funds, nor would it be suitable under the circumstances to do so. Therefore, adhering absolutely to distributing any and all program income before drawing grant funds would go above and beyond what is the maximum extent feasible. Therefore, the State will administer the CDBG-CLOSE Program without running afoul of 24 CFR 570.489(e)(3)(i) so long as it tailors its use of

program income in such a manner as to demonstrate that it is using it to the maximum extent feasible before making draws from the U.S. Treasury.

The State is using the following guidelines to allow it to effectively segregate CDBG-CLOSE program income from other sources of program income and allow draws from the U.S. Treasury for State CDBG Programs other than CDBG-CLOSE without tapping into CDBG-CLOSE program income. The guidelines are summarized as follows:

a) From program income amounts returned to the State under CDBG-CLOSE and in accordance with 24 CFR 570.489(e)(3), program income is committed to specific UGLG awards and program income is committed ahead of grant funds for any new or amended UGLG awards;
b) DEHCR-held program income that is not budgeted for UGLG awards is used ahead of draws from the U.S. Treasury for the State's administrative and technical assistance expenditures in accordance with 24 CFR 570.489(a);
c) UGLG-held program income will be used ahead of draws from the U.S. Treasury for that same UGLG, to the maximum extent feasible according to 24 CFR 570.489(e)(3)(i); and
d) Revolving fund program income remains subject to 24 CFR 570.489(f), which states that payments to the revolving fund are program income and must be substantially disbursed from the revolving fund before additional grant funds are drawn from the U.S. Treasury for revolving fund activities. Such program income will not be required to be disbursed for non-revolving fund activities.

These guidelines allow DEHCR to use funding for an UGLG from the budgeted source, without displacing other sources and requiring the administratively burdensome modification and execution of new awards to UGLGs. Furthermore, it facilitates DEHCR's compliance with overall LMI benefit, the public service cost cap, and the planning and administration cost cap, by giving DEHCR control over the funding source used by activity type.

These guidelines adhere to 24 CFR 570.489(e)(3)(i) as they require DEHCR to use program income before making draws from the U.S. Treasury where doing so is, to the maximum extent, feasible under the circumstances. As such, HUD's concurrence with DEHCR's interpretation of 24 CFR 570.489(e)(3)(i) is not plainly inconsistent with the Act, and HUD should give due deference to such interpretation if doing so is not plainly inconsistent with HUD's obligation to enforce compliance with Congress' intent as declared in the Act.

Under CDBG-CLOSE, UGLG's must:

1. Return to the Department the full balance of the locally held Revolving Loan Fund as indicated on the final report.
2. Dissolve the RLF under the process identified by the Department.
3. Complete all documentation required and requested by the Department.

Eligible recipients may utilize their CDBG-CLOSE grant award for the currently authorized programs as outlined in the State of Wisconsin 2025-2029 Consolidated Plan without the matching funds requirement:

1. Public Facilities;
2. Housing Rehabilitation Conversion;
3. Economic Development projects;
4. Public Facilities for Economic Development projects;
5. Planning projects

In addition to the programs identified above, the RLF Closeout Account can be used for the following special purposes:

6. Broadband/high speed internet access for low and moderate income (LMI) residents. grant funds can be used by the Unit of General Local Government (UGLG) for public infrastructure projects to expand broadband internet access. Examples of eligible expenses include the purchase of materials and installation.
7. Mitigation measures specifically those that address natural hazard risks; must connect the mitigation development or action to address impacts on LMI residents.
8. Public services.

The "Special Projects" category contains funding that will be used toward pilot projects and projects not typically funded by the Division in order to best respond to the evolving needs of the state.

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

The funding is distributed between goals in a way that meets the needs of the state, given the needs of the state and the capacity of current state programs. As described above, the priority needs, and specific objectives are addressed by the distribution of funding amongst the goals. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years. The State of Wisconsin will program an estimated $13,805,963.86 in CDBG PI funding that will be spent in a fungible fashion with grant funds in PY 2019. The Division will comply with the requirements under 24 CFR 570.489(e)(3)(i) as to the use of program income; however, DEHCR will

utilize the following steps, specifically for the use of formerly designated CDBG SF funds, in such a manner as to demonstrate that it is using it to the maximum extent feasible before making draws from the U.S. Treasury. The process steps are summarized as follows:

a) From formerly CDBG SF now programmed as CDBG PI funds and in accordance with 24 CFR 570.489(e)(3), program income is committed to specific CDBG awards in a fungible fashion as grant funds and CDBG PI is committed ahead of grant funds for any new or amended UGLG awards.
b) From formerly CDBG SF now programmed as CDBG PI funds that are not budgeted for UGLG awards will be used ahead of draws from the U.S. Treasury for the State's administrative and technical assistance expenditures in accordance with 24 CFR 570.489(a).

These guidelines adhere to 24 CFR 570.489(e)(3)(i) as they require DEHCR to use program income before making draws from the U.S. Treasury where doing so is, to the maximum extent, feasible under the circumstances. As such, HUD's concurrence with DEHCR's interpretation of 24 CFR 570.489(e)(3)(i) is not plainly inconsistent with the Act, and HUD should give due deference to such interpretation if doing so is not plainly inconsistent with HUD's obligation to enforce compliance with Congress' intent as declared in the Act.

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

Introduction:

The Division of Energy, Housing and Community Resources (DECHR) will use the following distribution methods for awarding program funds in CDBG, HOME, HOPWA, and ESG. The Wisconsin Housing and Economic Development Authority's Allocation Plan for HTF funds, pending HUD's approval, is included in the Attachments. Key elements of the method of distribution include the criteria used to select and rank applications, availability of application manuals, applicable threshold factors, and grant size limits. Additional information about each program can be found on the State of Wisconsin DECHR website.

The Division will comply with the requirements under 24 CFR 570.489(e)(3)(i) as to the use of program income; however, DEHCR will utilize the following steps, specifically for the use of formerly designated CDBG SF funds, in such a manner as to demonstrate that it is using it to the maximum extent feasible before making draws from the U.S. Treasury. The process steps are summarized as follows:

a) From formerly CDBG SF now programmed as CDBG PI funds and in accordance with 24 CFR 570.489(e)(3), program income is committed to specific CDBG awards in a fungible fashion as grant funds and CDBG PI is committed ahead of grant funds for any new or amended UGLG awards.
b) From formerly CDBG SF now programmed as CDBG PI funds that are not budgeted for UGLG awards will be used ahead of draws from the U.S. Treasury for the State's administrative and technical assistance expenditures in accordance with 24 CFR 570.489(a).

These guidelines adhere to 24 CFR 570.489(e)(3)(i) as they require DEHCR to use program income before making draws from the U.S. Treasury where doing so is, to the maximum extent, feasible under the circumstances. As such, HUD's concurrence with DEHCR's interpretation of 24 CFR 570.489(e)(3)(i) is not plainly inconsistent with the Act, and HUD should give due deference to such interpretation if doing so is not plainly inconsistent with HUD's obligation to enforce compliance with Congress' intent as declared in the Act.

The State's implementation of CDBG-CLOSE includes its interpretation of "maximum extent possible" as contained in 24 CFR 570.489(e)(3)(i). DEHCR has identified two significant feasibility problems regarding administering the CDBG-CLOSE program while adhering absolutely to distributing any and all program income before drawing grant funds. The first problem occurs when UGLGs request funds under open awards for other State CDBG Programs. The program income would displace and offset the committed grant funds. As the State's accounting system is grant-specific, this issue would require the modification and execution of potentially hundreds of additional award contracts from the same overall number of activities and dollar amounts.

The second problem is that using program income ahead of grant funds in such absolute terms disrupts the State's ability to plan for and ensure basic compliance with regulatory expenditure limitations on certain activity types, including overall low- and moderate-income (LMI) benefit, the public service cap, and the planning and administration cost cap. The State has legitimate concerns about its ability to comply with these limitations if grant funds are budgeted within the regulatory limitations, and those grant funds are later displaced by program income based solely on availability without regard for activity type.

Based on these expressed concerns, it is not possible or practical for the State to easily or conveniently adhere absolutely to distributing any and all program income before drawing grant funds, nor would it be suitable under the circumstances to do so. Therefore, adhering absolutely to distributing any and all program income before drawing grant funds would go above and beyond what is the maximum extent feasible. Therefore, the State will administer the CDBG-CLOSE Program without running afoul of 24 CFR 570.489(e)(3)(i) so long as it tailors its use of program income in such a manner as to demonstrate that it is using it to the maximum extent feasible before making draws from the U.S. Treasury.

The State is using the following guidelines to allow it to effectively segregate CDBG-CLOSE program income from other sources of program income and allow draws from the U.S. Treasury for State CDBG Programs other than CDBG-CLOSE without tapping into CDBG-CLOSE program income. The guidelines are summarized as follows:

e) From program income amounts returned to the State under CDBG-CLOSE and in accordance with 24 CFR 570.489(e)(3), program income is committed to specific UGLG awards and program income is committed ahead of grant funds for any new or amended UGLG awards;
f) DEHCR-held program income that is not budgeted for UGLG awards is used ahead of draws from the U.S. Treasury for the State's administrative and technical assistance expenditures in accordance with 24 CFR 570.489(a);
g) UGLG-held program income will be used ahead of draws from the U.S. Treasury for that same UGLG, to the maximum extent feasible according to 24 CFR 570.489(e)(3)(i); and
h) Revolving fund program income remains subject to 24 CFR 570.489(f), which states that payments to the revolving fund are program income and must be substantially disbursed from the revolving fund before additional grant funds are drawn from the U.S. Treasury for revolving fund activities. Such program income will not be required to be disbursed for non-revolving fund activities.

These guidelines allow DEHCR to use funding for an UGLG from the budgeted source, without displacing other sources and requiring the administratively burdensome modification and execution of new awards to UGLGs. Furthermore, it facilitates DEHCR's compliance with overall LMI benefit, the public service cost cap, and the planning and administration cost cap, by giving DEHCR control over the funding source used by activity type.

These guidelines adhere to 24 CFR 570.489(e)(3)(i) as they require DEHCR to use program income before making draws from the U.S. Treasury where doing so is, to the maximum extent, feasible under the circumstances. As such, HUD's concurrence with DEHCR's interpretation of 24 CFR 570.489(e)(3)(i) is not plainly inconsistent with the Act, and HUD should give due deference to such interpretation if doing so is not plainly inconsistent with HUD's obligation to enforce compliance with Congress' intent as declared in the Act.

Distribution Methods

Table 59 - Distribution Methods by State Program

1	**State Program Name:**	CDBG Economic Development
	Funding Sources:	CDBG

	Describe the state program addressed by the Method of Distribution.	The CDBG Economic Development program provides funds to local government to assist with business expansion and retention. Examples of eligible activities include business loans to expand facilities, purchase equipment, and employee training. The activity must result in job opportunities for low to moderate income individuals. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years. UGLG's that currently administer an Economic Development RLF are <u>required</u> to participate in CDBG-CLOSE. Under CDBG-CLOSE, all locally held, and funded by a CDBG award made on January 1, 1992 or later, Economic Development RLF as well as current Economic Development RLF accounts receivable will be held for UGLG's. These UGLG's will have non- competitive access to the funds to use as grants for eligible activities. There are three ways UGLG's will participate in CDBG-CLOSE. First, UGLG's that do not have **<u>any</u>** outstanding, current loans and **<u>only</u>** have cash on hand will receive credit for their RLF bank balance as grant funding. Under this option, UGLG's RLF Closeout Account will be determined as follows: RLF Bank Balance = RLF Closeout Account UGLG's with outstanding loans have the option under CDBG-CLOSE to either: 1. **<u>Purchase</u>** the value of **<u>all</u>** outstanding loans in the RLF portfolio and transfer those funds to DEHCR; 2. **<u>Retain the responsibility to</u>** service outstanding loans locally.

		Under CDBG-CLOSE, UGLG's that opt to **purchase** all outstanding loans will receive their RLF bank balance plus their purchase of their outstanding balance as grant funding. Under this option, UGLG's RLF Closeout Account will be determined as follows: RLF Bank Balance + Purchased RLF Accounts Receivable = RLF Closeout Account Under CDBG-CLOSE, UGLG's that opt to **retain the responsibility to** service outstanding loans locally will only receive credit for their RLF bank balance as grant funding. Under this option, UGLG's RLF Closeout Account will be determined as follows: RLF Bank Balance = RLF Closeout Account DEHCR will enter into a written agreement with all UGLG's that opt to retain the responsibility to service all outstanding loans. UGLG's must return all applicable loan repayments to the State. Amounts received by the State will be committed to specific UGLG awards; and, as sufficient amounts are accumulated these funds will be committed ahead of grant funds for any new awards. Amounts received will not displace grant funding from other UGLG's grant-funded awards.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The primary criteria used to select applications for funding are: • the three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • activities listed must be eligible activities • need for the funding All Revolving Loan Fund Accounts that were originally capitalized by a CDBG award from the State of Wisconsin prior to January 1, 1992 **and** have not received a subsequent award from January 1, 1992 to present from the State of Wisconsin **and** the State has closed out the source grant from which funds were originally used to capitalize the RLF **and** HUD has closed out the CDBG grant between HUD and the State for the original source year that capitalized the RLF are not subject to CDBG-CLOSE. These funds qualify under the program income reporting guidelines as defined in CPD Notice 04-11.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Applications are available on the DEHCR website. The CDBG-CLOSE application packet is included in the Appendices.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Only existing Units of General Local Government (UGLG) that hold a CDBG RLF-ED fund will apply for funding. UGLG's that do not have **any** outstanding, current loans and **only** have cash on hand will receive credit for their RLF bank balance as grant funding. UGLG's with outstanding loans have the option under CDBG-CLOSE to either: 1. Purchase the value of **all** outstanding loans in the RLF portfolio and transfer those funds to DEHCR; **or** 2. Retain **all** outstanding loans and service them locally. Under CDBG-CLOSE, UGLG's must: 1. Return to the Department the full balance of the locally held Revolving Loan Fund as indicated on the final report; 2. Dissolve the RLF under the process identified by the Department; 3. Complete all documentation required and requested by the Department.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a

	Describe how resources will be allocated among funding categories.	Applications and handbooks are available on the DEHCR website. Eligible recipients may utilize their RLF Closeout grant award for the currently authorized programs as outlined in the State of Wisconsin 2025-2029 Consolidated Plan without the matching funds requirement: 1. Public Facilities; 2. Housing Rehabilitation Conversion; 3. Economic Development projects; 4. Public Facilities for Economic Development projects; 5. Planning projects In addition to the programs identified above, the RLF Closeout Account can be used for the following special purposes: 6. Broadband/high speed internet access for low and moderate income (LMI) residents. grant funds can be used by the Unit of General Local Government (UGLG) for public infrastructure projects to expand broadband internet access. Examples of eligible expenses include the purchase of materials and installation. 7. Mitigation measures specifically those that address natural hazard risks; must connect the mitigation development or action to address impacts on LMI residents. 8. Public services.

	Describe threshold factors and grant size limits.	Resource allocation to CDBG Economic Development will be based upon several factors, including: • the number of applications received • historical funding amounts • State of Wisconsin needs • DEHCR priorities • Funding limits for eligible programs under CDBG-CLOSE are as follows: Public Facilities: $3,000,000 per project; Housing Rehabilitation: existing CDBG-H costs apply; Economic Development projects: $3,000,000 per project; Public Facilities for Economic Development projects; $3,000,000 per project; Planning projects: $75,000 per project In addition to the programs identified above, the RLF Closeout Account can be used for the following special purposes: Broadband/high speed internet: $3,000,000 per project; Mitigation measures specifically those that address natural hazard risks: $3,000,000 per project; Public services: $300,000 per project
	What are the outcome measures expected as a result of the method of distribution?	The State will publish an updated listing of current RLF accounts in its final, approved Annual Action Plan. Published amounts are estimates as they do not reflect current loan and repayment activity. See Attachments. Grantees have up to twenty-four (24) months from the start date of the CDBG-CLOSE program as defined by the State to submit an application for funding to DEHCR. Project activities must usually be completed within twenty-four (24) months from the date the funding is awarded (RLFs with large balances may be allowed additional time). Funds not disbursed within the specified time limit may be recaptured by DEHCR for reallocation to any other eligible CDBG project. All grant agreements will incorporate timelines to assure the project is on track to have successful completion within the grant term.

2	**State Program Name:**	CDBG Emergency Assistance Program
	Funding Sources:	CDBG, CDBG-DR
	Describe the state program addressed by the Method of Distribution.	The Emergency Assistance Program (EAP) utilizes CDBG housing funds for communities that have sustained damages to LMI housing as a result of natural or manmade disasters (flooding, tornados, windstorms etc.). EAP funds are available on an on-going basis. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Emergency Assistance Program (EAP) applications are evaluated for: • the severity of impact from the disaster • the LMI benefit • the financial need of the applicant
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	The EAP program description and application materials are available on the Division's website. Funds are directed specifically to non-entitlement communities. EAP is in a unique position to address emergency (natural or manmade disasters) housing rehabilitation and business assistance needs in a coordinated and timely response. The DECHR is exploring options to get needed resources to the affected households more quickly. The seven CDBG housing regions could play a critical role in expediting this process.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	Explained above.
	Describe threshold factors and grant size limits.	EAP funds are available statewide and, depending on the nature and frequency of natural disasters, vary in their award amounts.

	What are the outcome measures expected as a result of the method of distribution?	Unknown at this time. Funding allocated based on disaster event.
3	**State Program Name:**	CDBG Housing, CDBG-CV, CDBG-DR
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Wisconsin Community Development Block Grant (CDBG) housing program provides grants to general purpose units of local government for housing programs which principally benefit low and moderate income (LMI) households. These funds are primarily used for rehabilitation of housing units (owner occupied and rental), homebuyer assistance and conversion of commercial or public buildings to housing. CDBG dollars are flexible and responsive to local needs. DEHCR is seeking opportunities for CDBG-Housing grantees to collaborate with local home weatherization providers to achieve efficiencies and maximize available resources. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The state is divided into seven housing regions to administer the CDBG housing program. The regions receive fair share funds. These shares include base funding for each region. In addition to the base funding, the remainder of the funds are divided using four factors: • households below 80% of County Median Income and pay more than 30% of income on housing • average unemployment rate • percentage of LMI Households compared to the total statewide • percentage of structures built before 1950 compared to the total statewide In addition to the regions, DEHCR offers municipalities the opportunity to withdraw from a region and apply separately for set-aside funds. These funds are determined using the same four-factor formula as the CDBG housing regions.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	The regional and the non-regional applications are available on the Division's website when the application periods are open. In addition, the non-regional application is emailed to every municipality in the state, except for the counties of Dane, Waukesha, and Milwaukee which receive funds directly from HUD. The regional applications are targeted to each region. CDBG Housing Rehabilitation is eligible under CDBG-CLOSE; however, DEHCR is unable to accurately predict whether or how much CDBG-CLOSE funding will be expended under this category.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	Explained above.
	Describe threshold factors and grant size limits.	The fair share is determined based on funds available for CDBG Housing. The allocation for CDBG housing is entered into the formula and determined using the factors above.

	What are the outcome measures expected as a result of the method of distribution?	The State will publish an updated listing of current RLF accounts in its final, approved Annual Action Plan. Published amounts are estimates as they do not reflect current loan and repayment activity. See appendix.
4	**State Program Name:**	CDBG Planning
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The CDBG Planning program allows communities to create plans to address issues of LMI and slum and blight. The plans can be comprehensive plans, economic development plans, and downtown redevelopment plans. Each plan must have an outcome that meets a national objective. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The primary criteria used to select applications for funding are: • the three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • activities listed must be eligible activities • need for the funding
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Applications and handbooks are available on the DEHCR website.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other **community-based organizations). (HOPWA only)**	n/a

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	Describe how resources will be allocated among funding categories.	Resource allocation to CDBG Planning will be based upon several factors, including: • the number of applications received • historical funding amounts • State of Wisconsin needs • DEHCR priorities Planning is eligible under CDBG-CLOSE; however, DEHCR is unable to accurately predict whether or how much CDBG-CLOSE funding will be expended under this category.
	Describe threshold factors and grant size limits.	The grant size limit for a CDBG Planning Grant is $50,000 and includes a 1 for 2 match requirement. CDBG Planning for Broadband Expansion have a maximum of $75,000 with no match required. Under CDBG-CLOSE, the maximum award size is $75,000.
	What are the outcome measures expected as a result of the method of distribution?	
5	**State Program Name:**	CDBG Public Facilities
	Funding Sources:	CDBG, CDBG-DR, CDBG-CV

	Describe the state program addressed by the Method of Distribution.	CDBG Public Facilities program addresses infrastructure issues in communities including, but not limited to: water, sanitary sewer, storm sewer, utilities, streets, wastewater treatment, broadband communications, fire stations, community centers, and libraries. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The primary criteria used to select applications for funding are: • the three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • activities listed must be eligible activities • need for the funding Public Facilities is eligible under CDBG-CLOSE; however, DEHCR is unable to accurately predict whether or how much CDBG-CLOSE funding will be expended under this category.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Applications and handbooks are available on the DEHCR website.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other **community-based organizations). (HOPWA only)**	n/a
	Describe how resources will be allocated among funding categories.	Resource allocation to CDBG Planning will be based upon several factors, including: • the number of applications received • historical funding amounts • State of Wisconsin needs • DEHCR priorities
	Describe threshold factors and grant size limits.	The grant size limit for a CDBG Public Facilities grant is $2,000,000 and includes a $1 for every $2 in CDBG funds awarded as a match requirement. Under CDBG-CLOSE, the maximum award size is $3,000,000.

	What are the outcome measures expected as a result of the method of distribution?	
6	**State Program Name:**	CDBG Public Facilities Economic Development
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The CDBG Public Facilities program addresses infrastructure issues in communities such as water systems, wastewater systems, and streets that are an impediment to economic development. Improving infrastructure deficiencies results in the promotion of economic development. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The primary criteria used to select applications for funding are: • the three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • activities listed must be eligible activities • need for the funding Public Facilities for Economic Development is eligible under CDBG-CLOSE; however, DEHCR is unable to accurately predict whether or how much CDBG-CLOSE funding will be expended under this category.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Applications and handbooks are available on the DEHCR website.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	Resource allocation to CDBG Public Facilities for Economic Development will be based upon several factors, including: • the number of applications received • historical funding amounts • State of Wisconsin needs • DEHCR priorities
	Describe threshold factors and grant size limits.	The grant size limit for a CDBG Public Facilities Economic Development grant is $750,000. Under CDBG-CLOSE, the maximum award is $3,000,000 per project.

	What are the outcome measures expected as a result of the method of distribution?	
7	**State Program Name:**	Convert Commercial or Public Buildings to Housing
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The housing conversion program is used to benefit low and moderate-income households by: 1. Expansion or creation of affordable housing stock for low- and moderate- income (LMI) persons. 2. Elimination of housing conditions detrimental to public health, safety and welfare. Under the program, authorized under 24 CFR 570.202 (e), local CDBG-Housing RLF's will return all program income to the State. The State will award returned funds for eligible conversion projects to UGLG's utilizing these funds. All existing as well as future program income generated by local CDBG-Housing RLF's will be returned to the State and awarded for eligible CDBG Housing Conversion projects. If in a given year, insufficient demand exists for CDBG Housing Conversion projects, the State reserves the right to re-award revenues received from local CDBG-Housing RLF's to augment CDBG Housing Rehabilitation awards.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Projects will be evaluated and compared with other proposals using criteria including but not limited to: • Term of affordability. (Minimum 5 years)/ Preference given to permanent affordability. • Project Readiness • Availability of Financing/Funding leverage • Developer Team Experience • Project Feasibility Preference will be given to projects that provide one or more of the following elements and may also be eligible for an increased award amount. • Projects that utilize renewable energy systems, sustainable and resilient design elements. • Projects that improve access to rental housing through generous tenant screening criteria. • Projects that include three (3) bedroom units • Projects that are geographically located to maximize access to jobs, transit, schools and other key amenities.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Applications and handbooks are available on the DEHCR website.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	Resource allocation to CDBG Convert Commercial or Public Buildings to Housing will be based upon several factors, including: • the number of applications received • available revenues • State of Wisconsin needs • DEHCR priorities
	Describe threshold factors and grant size limits.	The grant size limit for a CDBG Convert Commercial or Public Buildings to Housing grant is $2,000,000.
	What are the outcome measures expected as a result of the method of distribution?	CDBG Housing Conversion is eligible under CDBG-CLOSE; however, DEHCR is unable to accurately predict whether or how much CDBG-CLOSE funding will be expended under this category.

9	**State Program Name:**	HOME Homebuyer and Rehabilitation (HHR)
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	The program is designed to provide funding for two HOME-eligible activities: • Homebuyer assistance: Direct assistance may be provided to eligible homebuyers for acquisition (down payment and closing costs), acquisition and rehabilitation, or new construction. Grantees may utilize the funds to construct housing for sale to low- and moderate-income (LMI) homebuyers (household income at or below 80% County Median Income). • Owner-occupied rehabilitation: Funds are provided for making essential improvements to single-family homes serving as the principal residence of LMI owners. In addition, eligible costs include energy-related improvements, accessibility improvements, lead-based paint hazard reduction, and repair of code violations.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Funding is allocated based on need to service households below 80% of County Median Income. Specific items requested in the application include, but are not limited to the following: • Amount of funds requested by each applicant and by activity • Housing need description • Marketing plan • Waiting lists • Outreach process • Implementation schedule

	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	n/a
	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other **community-based organizations). (HOPWA only)**	n/a
	Describe how resources will be allocated among funding categories.	Explained above.

	Describe threshold factors and grant size limits.	Explained above.
	What are the outcome measures expected as a result of the method of distribution?	
10	**State Program Name:**	HOME Rental Housing Development program (RHD)
	Funding Sources:	HOME

	Describe the state program addressed by the Method of Distribution.	The priorities of the HOME RHD program are: • To provide leverage of private financing for affordable rental housing. • To provide persons at or below 60% of County Median Income (CMI) additional affordable housing units. • To provide gap financing for affordable rental housing. • To construct buildings that provide accessibility features following Universal Design, and follow visitability principles. • To develop projects that emphasize high energy efficiency and sustainability. • To promote supportive housing projects for populations with special needs. • To facilitate affordable rental projects that are "shovel-ready" and will start construction within 12 months of contract execution.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	RHD funds are awarded through a competitive process. To qualify, applicants much achieve a high enough score in both threshold criteria and designated scoring categories. These requirements were implemented to both meet and exceed those outlined in the 2013 HOME Final Rule. Chief among these new requirements are the financial feasibility standards requiring that a subsidy layering review be completed for all projects to determine the staffing and financial capacity of the developing entity as well as the long-term feasibility of the proposed rental project. Specific criteria include, but are not limited to, the following: • Percentage of units at or below 60% CMI/homeless/Section 811 • Preservation of any subsidized property (excluding Public Housing) • Percentage of visitable HOME units • Energy efficiency and sustainability • HOME cost per unit

	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	n/a
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	If projects pass threshold, then they will be scored and ranked. Projects will be funded as funds permit and until funding is exhausted.

	Describe threshold factors and grant size limits.	Threshold factors for applications: • Long term viability • Demonstrated experience • Audited financials • CHDO certification • Debarment certification for entities receiving federal funds • Market demand documentation • Department of Financial Institutions (DFI) documentation • Readiness to proceed • Percentage of CMI units HOME RHD sets a maximum of $1,000,000 per award, and no more than 2 awards per developer per year, except for CHDO recipients.
	What are the outcome measures expected as a result of the method of distribution?	
11	**State Program Name:**	HOME Tenant Based Rental Assistance (TBRA)
	Funding Sources:	HOME

	Describe the state program addressed by the Method of Distribution.	Tenant Based Rental Assistance (TBRA) is a rental subsidy that sub-grantees can use to help individual households with incomes at or below 80% of the county median income (CMI) afford housing costs such as rent and security deposits. Sub-grantees may also assist tenants with utility deposits when HOME is used for rental assistance or security deposits. HOME-TBRA targets low-income households struggling to obtain and maintain permanent affordable housing.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Funds are awarded through a multi-year grant application process open to any UGLG (Units of General Local Government) or private nonprofit agency in Wisconsin that meets the application eligibility criteria. Awarded grants can potentially be renewed in subsequent years, but the submission of a grant application is still required. Submitted grant applications are reviewed and scored.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	n/a
	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	
	Describe threshold factors and grant size limits.	
	What are the outcome measures expected as a result of the method of distribution?	

12	**State Program Name:**	Housing Opportunities for Persons With AIDS (HOPWA)
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	HOPWA provides housing assistance and supportive services for income-eligible persons with acquired immunodeficiency syndrome or related diseases, and their families.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Selected applicants must be able to provide qualifying HOPWA services that are critical to meet the needs of their communities.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	n/a
	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	The Division of Energy, Housing and Community Resources issues a request for proposal for project sponsors. The applicant(s) is/are chosen based on their ability to provide HOPWA services.
	Describe how resources will be allocated among funding categories.	For DEHCR's HOPWA grant, assistance will be provided for: • short term rental assistance • associated supportive services • housing counseling • Tenant Based Rental Assistance • Housing Information Services (HIS) • Permanent Housing Placement (PHP) • Other eligible HOPWA activities to support housing for qualifying population.
	Describe threshold factors and grant size limits.	HOPWA funds are received from HUD as a formula grant annually.

	What are the outcome measures expected as a result of the method of distribution?	The outcome measures are numbers of HOPWA eligible persons and their families who receive housing assistance and supportive services necessary to maintain housing.
13	**State Program Name:**	Emergency Solutions Grant (ESG)
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	The ESG program provides funding to: • engage homeless individuals and families living on the street • improve the quality and quantity of emergency shelters for homeless individuals and families • help operate these shelters • provide essential services to shelter residents • rapidly re-house homeless individuals and families • prevent families and individuals from becoming homeless

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Applicants to the ESG program are lead agencies representing geographically distributed groups of homeless service providers. All lead agencies must complete the ESG application according to guidelines. DEHCR apportions the funding amongst the applicants using a formula applied by DEHCR. The formula's elements include a number of measures of homelessness and poverty, as well as measures of the efficiency and effectiveness of individual homeless service providers. Additional variables may be added as additional data becomes available in order to best distribute funding according to the needs of communities and performance of homeless service providers.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	n/a

	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	The formula described above is used to give each homeless coalition or HUD continua of care an allocation. While staying within HUD and DEHCR limitations, each local homeless coalition or HUD CoC must allocate their portion of the funds to local projects based on local needs. Homeless coalition or HUD continua then submit their Consolidated Application to DEHCR for approval. The application contains their proposed projects, and justification for funding these projects. If DEHCR does not find problems during technical review, DEHCR approves the application and funds the agencies at the proposed levels. Local homeless coalitions are made up of the homeless service providers in each community, including local units of government, community and faith-based organizations, and area nonprofits. Decisions about which agencies receive funding and how much funding they receive are local decisions.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other **community-based organizations). (HOPWA only)**	n/a
	Describe how resources will be allocated among funding categories.	Resources are allocated according to funding floors established by HEARTH and in order to promote best practices and priorities established by the DECHR. Local homeless coalitions then decide how to fund agencies within these limitations.

	Describe threshold factors and grant size limits.	Grant awards are based on the amount of funding received from HUD, and the funding formula (described above) is used to distribute funds to local Continua of Care.

	What are the outcome measures expected as a result of the method of distribution?	
14	**State Program Name:**	Housing Trust Fund
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	HTF provides additional resources to construct and rehabilitate housing for extremely low-income Wisconsin families.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	DEHCR developed its HTF Allocation Plan and it is included in the Attachments.

	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	n/a
	Describe the process for awarding funds to state recipients and how the state will make its allocation available **to units of general local government, and non-profit organizations, including community and faith-based** **organizations. (ESG only)**	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other **community-based organizations). (HOPWA only)**	n/a

	Describe how resources will be allocated among funding categories.	DEHCR developed its HTF Allocation Plan and it is included in the Attachments.
	Describe threshold factors and grant size limits.	HTF funds are received by DEHCR from HUD as a formula grant annually. DEHCR will utilize the per unit subsidy limits for the HOME program.
	What are the outcome measures expected as a result of the method of distribution?	The outcome measures are numbers of new and rehabilitated housing units created with HTF funds annually.

Discussion:

In addition to the programs discussed above, DEHCR is committed to working with businesses and other public agencies in order to develop initiatives that will lead to increased stability and long-term employment opportunities for targeted group members. While DEHCR recognizes that targeted group members have a wide variety of needs, it anticipates that its efforts will also be focused on the following areas:

1. Job Training
2. Public Services
3. Economic and Community Development
4. Microenterprises
5. Housing
6. Public Infrastructure

If enough applications meeting the criteria described in the above-mentioned DEHCR programs are not received in a given action plan year, DEHCR reserves the right to redirect each program's unused funds to other programs described in the method of distribution to ensure maximum utilization of funds.

26 CDBG HOUSING PROGRAM - REGIONS				
Region Name	**BALANCE**	**CONTACT PERSON**	**CONTACT PHONE**	**CONTACT EMAIL**
Central/Juneau County	$ 21,775.62	Julie Oleson	608-847-7309	joleson.jcha@gmail.com
Northeastern/Brown County	$ -	Todd D. Mead	920-448-6480	Todd.Mead@browncountywi.gov
Northwest/Douglas County	$ 10,762.58	Kim Gifford	715-635-2197	Kgifford@nwrpc.com
Northwoods/Langlade County	$ -	Kaytlin Gabrielson	715-752-4620	kgabrielson1@gmail.com
Southern/Columbia County	$ 2,220.07	Kari Justmann	800-552-6330	Kjustmann@msa-ps.com
Southwest/La Crosse County	$ 11,493.15	Sara Berger	608-632-6512	Sara.Berger@Couleecap.org
West Central/Chippewa County	$ 4,845.53	Richelle Rizzo	715-726-7935	rrizzo@chippewacountywi.gov
Central/Juneau County	$ 21,775.62	Julie Oleson	608-847-7309	joleson.jcha@gmail.com

AP-35 Projects – (Optional)

Introduction:

The state has not identified site specific projects for 2026 at this time. Funding allocations for CDBG, HOME, ESG, HOPWA and HTF projects will not be determined until program-specific applications are received and evaluated. Only entitlement communities report projects under this section.

UGLG's that currently administer an Economic Development Revolving Loan Fund are required to participate in the CDBG-CLOSE program.

These UGLG's will have the option to utilize CDBG-CLOSE funds for up to two (2) projects totaling the amount of their RLF Closeout Account. In addition, UGLG's may submit an application for up to one (1) additional Planning project. Depending upon the RLF Closeout Account balance, some communities may be eligible to apply for more than two projects.

UGLG's that opt to purchase all outstanding loans will have the option to utilize these funds for up to three (3) projects. For UGLG's with large RLF Closeout Balances, an additional fourth (4) project may be applied for, as determined by DEHCR.

UGLG's that opt to retain all outstanding loans and service them locally will have the option to utilize CDBG-CLOSE funds for up to two (2) projects totaling the amount of their RLF Closeout Account. In addition, UGLG's may submit an application for up to one (1) additional Planning project. Depending upon the RLF Closeout Account balance, some communities may be eligible to apply for more than two projects. DEHCR will enter into a written agreement with all UGLG's that opt to retain the responsibility to service all outstanding loans. UGLG's must return all applicable loan repayments to the State. Amounts received by the State will be committed to specific UGLG awards; and, as sufficient amounts are accumulated these funds will be committed ahead of grant funds for any new awards. Amounts received will not displace grant funding from other UGLG's grant-funded awards.

#	Project Name

Table 60 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

In 2018, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, HUD appropriated CDBG Disaster Recovery Funds to affected states. These funds will be used in Wisconsin to meet housing, business, and infrastructure needs caused by the disasters.

AP-38 Project Summary

Project Summary Information

Not applicable

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No.

Available Grant Amounts

Not Applicable.

Acceptance process of applications

Not Applicable.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State's Process and Criteria for approving local government revitalization strategies

Not applicable. The Division of Energy, Housing and Community Resources (DEHCR) allows all non-entitlement communities to submit applications to programs on a competitive basis.

AP-50 Geographic Distribution – 91.320(f)

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

The Division of Energy, Housing and Community Resources (DEHCR) has not chosen geographic target areas as a basis for funding allocation priorities. Rather, DEHCR allows all non-entitlement communities to submit applications to programs on a competitive basis.

Geographic Distribution

Target Area	Percentage of Funds

Table 61 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG: DEHCR does not typically award CDBG funds in entitlement communities that receive CDBG funds from HUD directly. CDBG Non-Housing programs typically receive applications from units of local government (UGLGs) across Wisconsin. Applications are reviewed and funded with those projects and areas that will have a significant impact or make a substantial contribution to enhancing the overall economic well-being of the state receiving priority. UGLG's that currently administer an Economic Development Revolving Loan Fund are required to participate in the CDBG-CLOSE program. The CDBG Housing program distributes funds to seven housing regions, and then the regional administrator of each housing region distributes dollars around the region.

HOME: DEHCR does not award HOME funds in participating jurisdictions or consortia that receive HOME funds directly from HUD. Rental Housing Development, Homebuyer and Rehabilitation, and Tenant Based Rental Assistance funds are awarded in the rest of the state (not in participating jurisdictions or consortia) on a competitive basis.

ESG: In Wisconsin, DEHCR, and the cities of Madison, Milwaukee, and Racine receive ESG funds directly from HUD. DEHCR ESG funds are awarded on a formula basis to regional entities throughout the state using indicators of poverty and homelessness.

HOPWA: DEHCR provides the opportunity through its NOFO for service providers to provide eligible services in the 68 counties in DEHCR's HOPWA area.

HTF: DEHCR administers the National Housing Trust Fund (HTF) program in Wisconsin. DEHCR's HUD-approved HTF Allocation Plan does not limit HTF awards geographically; however, provides preference to potential projects located in the following areas:

1. Properties located in a High Need Area as defined in the WHEDA Qualified Allocation Plan for the Low-Income Housing Tax Credit program which can be found at https://www.wheda.com/LIHTC/Allocating/ OR
2. On Federally designated Tribal Lands, a Rural Area without a Recent Housing Tax Credit Award, or a Workforce Housing Community – areas to be defined through WHEDA's 2021-2022 Qualified Allocation Plan for the Low-Income

Housing Tax Credit program.

Discussion

Affordable Housing

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

Introduction:

In the tables below the Division of Energy, Housing and Community Resources (DEHCR) PY2026 goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing are listed. Affordable housing support will be provided through multiple program activities including, rental assistance**,** construction of new units**,** rehabilitation of existing units**,** and potentially acquisition of existing units. The estimates do not include the provision of homeless services such as emergency shelter, etc.

One Year Goals for the Number of Households to be Supported	
Homeless	**797**
Non-Homeless	**961**
Special-Needs	**2,049**
Total	**3,807***

Table 62 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	**2,846**
The Production of New Units	**235**
Rehab of Existing Units	**433**
Acquisition of Existing Units	**293**
Total	**3,807***

Table 63 - One Year Goals for Affordable Housing by Support Type

***Final HTF numbers TBD**

Discussion:

The estimates above are derived from the “Rehabilitate Owner Occupied Housing,” “Rehabilitate Rental Housing,” “Build New Rental Housing,” “Conversion of Commercial or Public Buildings to Housing”, “Provide Down Payment Assistance to Homebuyers,” and “Provide Tenant-Based Rental Assistance” goals.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The Division of Energy, Housing and Community Resources (DEHCR) will continue to review non-entitlement Annual and 5-Year Public Housing Authority (PHA) Plans to ensure that they are consistent with DEHCR's Consolidated Plan.

The Division of Energy, Housing, and Community Resources is committed to preventing and ending homelessness in Wisconsin. PHAs are a vital community partner, and their involvement is crucial to successful efforts to end homelessness. The Division encourages PHAs to partner with their area's HUD Continuum of Care and consider the needs of households experiencing homelessness when developing their PHA Plan. If such needs exist, the Division strongly encourages PHAs to take steps described in HUD's Notice PIH 2013-15 to target housing assistance to households who are experiencing homelessness.

DEHCR solicited and received comments from stakeholder groups on its 2025-2029 Consolidated Plan and 2026 Annual Action Plan. Stakeholder groups are encouraging the Division to request PHA's to work with local Continua of Care in order to gain access to their networks of homeless assistance providers. The Division is currently reviewing how to encourage PHA's to work with CoC's in order to best leverage homeless assistance providers' knowledge, skills and follow-up services.

Actions planned during the next year to address the needs to public housing

Not Applicable.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Not Applicable.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

DEHCR has no administrative authority over Public Housing Authorities. Although the Division does not have any specific responsibility related to addressing SEMAP issues, DEHCR staff will continue to serve as resource advisors to the Wisconsin Association of Housing Authority (WAHA) board of directors and be available to provide assistance to "troubled" PHAs where feasible.

Discussion:

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

Introduction

The Division of Energy, Housing and Community Resources (DEHCR) is committed to preventing and ending homelessness in Wisconsin. Because DEHCR has a limited amount of funds available for homeless service programs, it will seek to collaborate with the four HUD Continua of Care, other state agencies, local governments, nonprofits, and private business in order to work towards these goals. DEHCR programs will emphasize the use of evidence-based practices and efficient uses of funds. Additional details are found below as well as in the AP-20 Annual Goals section.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Coordinated entry has the potential to create more efficient homeless service systems by targeting resources toward those who need them most and helping clients move through the system faster. In Wisconsin, coordinated entry has been implemented at the CoC level. DEHCR will continue to require participation in coordinated entry for their CoC as a part of the ESG program.

DEHCR recognizes that street outreach to those experiencing homelessness is necessary to engage them and work towards housing stability. Street outreach is especially critical to those experiencing chronic homelessness, and DEHCR encourages agencies to use street outreach to engage the population of persons experiencing chronic homelessness. DEHCR encourages the use of best practices in street outreach which seek to meet basic needs and engage those experiencing homelessness in a respectful way.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency shelter is a critical part of the homeless service system. Shelters provide temporary refuge and often serve as the "front door" or first place of entry to those experiencing homelessness. It is important that emergency shelters have the ability to connect those experiencing homelessness with the resources needed to exit homelessness using the lightest touch possible. DEHCR measures the performance of emergency shelters and continua of care using a variety of metrics, including clients served, average length of stay, recurrence and occupancy rate. DEHCR will continue to measure the performance and direct more funding towards best performing shelters. New transitional housing projects are not funded by the ESG program, but DEHCR allows the use of transitional housing in cases where it has been demonstrated to be to an efficient and effective use of scarce resources.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The ESG program supports rapid-rehousing programs across the state. Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing. Rapid re-housing has the potential to decrease the length of time participants spend homeless, lessening the strain on the shelter system. Case management and other voluntary services

provided along with rental subsidies may stabilize families so that they can maintain rent payments after rental assistance ends.

Homeless prevention programs are also funded by both ESG and other state funds. These funds allow agencies to keep individuals and families from becoming homeless in the first place. Prevention allows families to avoid potential trauma, upheaval, and an eviction on their record. In order to promote efficient use of funds, DEHCR requires targeting of prevention funds towards those who are most likely to experience homelessness without assistance through the use of coordinated entry.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Through its involvement with the Interagency Council on Homelessness, DEHCR works with the four Wisconsin CoC's and other state agencies which house publicly funded systems that may discharge persons into housing instability or homelessness. Collaboration allows DEHCR and these agencies to work towards discharge planning solutions. DEHCR collaborates with the Department of Children and Families to administer a program targeted at youth who have aged out of the foster care system and are experiencing homelessness or are at risk of homelessness.

DEHCR works with the Wisconsin Housing and Economic Development Authority (WHEDA) to administer the Housing Trust Fund in Wisconsin. HTF provides additional resources to construct and rehabilitate housing for extremely low-income Wisconsin families including homeless persons, persons at risk of homelessness, individuals, families, families with children and veterans.

Discussion

AP-70 HOPWA Goals – 91.320(k)(4)

One-year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	159
Tenant-based rental assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	159

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

Introduction:

The Division of Energy, Housing and Community Resources (DEHCR)'s overall strategy to address barriers to affordable housing has been previously discussed in SP-55. Due to an unavoidable overlap between issues of furthering affordable housing and of providing fair housing, the actions outlined in DEHCR's 2025-2029 Fair Housing Plan should also be consulted. Below, the State's limited legal authority for addressing barriers to affordable housing is explained and DEHCR's planned actions are outlined.

The EAP is strictly a housing rehab program that does not directly address barriers to affordable housing. The program assists recipients through the provision of affordable housing by addressing their situation after a natural disaster event through rehab, replacement and relocation.

DEHCR works with the Wisconsin Housing and Economic Development Authority (WHEDA) to administer the Housing Trust Fund in Wisconsin. HTF provides additional resources to construct and rehabilitate housing for extremely low-income Wisconsin families including homeless persons, persons at risk of homelessness, individuals, families, families with children and veterans.

Describe planned actions to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The State of Wisconsin's "home rule" provisions mean that zoning ordinances are left to the judgment of local governments. Sometimes local governments, in an attempt to cover the broad-based costs of public facilities improvements or to slow down a boom in new housing starts, will choose to impose impact fees, increasing lot sizes and setbacks, or establishing minimum square foot requirements for new residences. State statutes do allow local governments to waive impact fees for affordable housing developments, but it is not known how often these fees are actually waived. The net effect of these local actions may make housing more expensive than it would be without the new fees and regulations, which may represent a barrier to affordable housing for people in lower income brackets.

DEHCR cannot directly intervene to remove barriers to affordable housing that results from a local ordinance's imposition of regulations or fees. DEHCR and other state agencies work to ameliorate barriers to affordable housing in several ways, including:

- Support for the WIHousingSearch.org website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.
- DEHCR works to improve the stock of affordable housing in non-entitlement jurisdictions through its state- and federally funded housing programs.
- The Wisconsin Housing and Economic Development Authority's (WHEDA) Low-Income Housing Tax Credit (LIHTC) program offers a reduction in tax liability to property owners and private investors to encourage the development of affordable rental housing.
- DEHCR's administration of the Housing Trust Fund provides additional housing units for extremely low-income persons

or families in Wisconsin.

Discussion:

AP-85 Other Actions – 91.320(j)

Introduction:

The Division of Energy, Housing and Community Resources (DEHCR) plans a number of other actions to address issues related to: obstacles to meeting underserved needs, fostering and maintaining affordable housing, reducing lead-based paint hazards, reducing the number of poverty-level families, developing institutional structure, and enhancing coordination between public and private housing and social service agencies. These are outlined below.

Actions planned to address obstacles to meeting underserved needs

DEHCR will continue efforts to ensure maximum state coverage with program resources. Emphasis will also be placed on enhancing local capacity building and serving disadvantaged and under-served areas.

DECHR continually evaluates its administration of CDBG and HOME funds in order to meet Wisconsin's affordable housing and community and economic development needs. Two examples of this dedication to program evolution is HUD's approval of DEHCR's Substantial Amendment #4 and #5 to its 2015-2019 Consolidated Plan to make the following programmatic changes:

1. Expand the use of CDBG-RLF funding to allow for public facilities/infrastructure improvements.
2. CDBG – Public Facilities – increase the award amount to $2,000,000 and creates a $1 match requirement for every $2 in CDBG funding awarded.
3. CDBG – Public Facilities for Economic Development – increase award amount to $750,000 from current limit of $500,000.
4. Increase the CDBG - Planning grant to $50,000, from its current limit of $25,000 and add a $25,000 match requirement.
5. Create a new category of CDBG - Planning for Broadband Expansion. Fund awards at a maximum of $75,000/ no match required.
6. Expand the use of CDBG PI from the former CDBG SF account as funds spent in a fungible fashion with grant funds.
    a) Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.
7. Eliminate the requirement for CHDO's to re-certify on an annual basis.
8. Create new flexibilities under the HOME – Tenant Based Rental Assistance to enable grantees to rent to homeless persons or families without the current requirement that they have a family member with a disability.
9. Increase its maximum award under the Rental Housing Development (RHD) program from $500,000 to $1,000,000.
10. For CHDO applicants only, eliminate the $1,000,000 maximum per year per recipient.

DEHCR will continue to work collaboratively with units of general local government (UGLGs) so that nonprofit entities and businesses will be able to receive grants, loans and/or equity investments for activities that are allowed under the federal guidelines and best address the needs of the local community.

DEHCR will continue proven program approaches as well as efforts to improve strategies and explore more efficient and effective approaches to address community needs with maximum responsiveness, including:

- Collaborate with WHEDA, HUD, USDA Rural Development, and US Department of Commerce-Economic Development Administration to address special housing and community and economic development opportunities and sponsor training and technical assistance for local officials to increase knowledge of and access to available state and federal

programs and resources.

Review current policies and procedures related to maximizing the efficient reuse of program income funds to meet critical needs. DEHCR will pursue modifications where redirecting resources could address gaps in programs with unmet critical needs.

Actions planned to foster and maintain affordable housing

The Division of Energy, Housing and Community Resources (DEHCR) will continue to fund affordable housing programs through CDBG Housing and HOME funding. The HOME program funds the construction, acquisition, and rehabilitation of single family and multifamily affordable housing, and provides rental and down payment assistance to lower income households. The CDBG-Housing program funds rehabilitation of single family and multifamily affordable housing and provides down payment assistance to lower income households. Rehabilitation is eligible for funding under CDBG-CLOSE.

DEHCR supports the WIHousingSearch.org website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.

DEHCR will coordinate affordable housing resources with the Wisconsin Housing and Economic Development Authority (WHEDA), specifically regarding the Low-Income Housing Tax Credits and Housing Trust Fund programs. Members of WHEDA's staff also provide advice to DEHCR's Rental Housing Development (RHD) program.

DEHCR will use Tenant Based Rental Assistance (TBRA) funds in markets where there are rental housing choices for lower income renters and persons experiencing homelessness, but where they are experiencing or would experience a housing cost burden and need temporary assistance with monthly payments.

DEHCR will use HOPWA funding to provide short-term rental assistance and supportive services to persons with HIV/AIDS and their families.

New units of rental housing will be constructed in markets with a significant number of Low-Income renter households and an insufficient stock of affordable housing units.

Rehabilitation will be used in markets where there are significant numbers of Low-Income households requiring rental or owner-occupied housing and an adequate stock of housing units which could be rehabilitated into decent, safe, and sanitary housing.

Acquisition will be used in markets where there are significant numbers of low-income families requiring decent, safe, and sanitary housing. DEHCR will provide acquisition funds, including preservation, to grantees based on a competitive application for funding.

Actions planned to reduce lead-based paint hazards

In programs administered by DEHCR, lead-safe work practices will be used in pre-1978 units whenever the rehabilitation disturbs a painted or varnished surface. Examples of this include window and door replacement, and exterior treatments to include siding and porch repair and/or replacement. DEHCR, the Department of Housing and Urban Development and the Division of Public Health (Department of Health Services) will work together to offer training to interested parties. DEHCR's

programs work in concert with the Division of Public Health's Lead Safe Homes Program which helps low-income families living in homes older than 1978 by fixing lead hazards before children are exposed to lead. Contractor and risk assessor training opportunities will be communicated to interested parties through current DEHCR CDBG, ESG, Supportive Housing, and HOME grantees as well as through local housing authorities. Lead Risk Assessors, Lead-Safe Renovators and Lead Abatement Workers/Supervisors must be trained in accordance with the WI Department of Health Services Administrative Rule 163.

Lead risk assessments will be conducted on units in accordance with the Lead-Safe Housing Rule. The decision to conduct a risk assessment is based on the age of the property and the cost of the rehabilitation necessary to bring the property up to the decent, safe and sanitary requirements. All projects that are completed in a pre-1978 home that disturb painted/varnished surfaces must be conducted by trained Lead-Safe Renovators and pass a lead clearance. While all projects may not be intended to reduce a lead-based paint hazard, many lead hazards are addressed through the use of lead-safe work practices in the course of the rehabilitation on a housing unit.

All properties identified containing a child with an elevated blood-lead level will continue to be addressed by a certified Lead Abatement contractor to carry out the lead hazard reduction activities.

Actions planned to reduce the number of poverty-level families

The Projects for Assistance in Transition from Homelessness (PATH) initiatives, as administered by the State of Wisconsin, Department of Health, target individuals experiencing serious mental illness and homelessness, resulting in greater self-sufficiency for participants. ESG rapid re-housing and prevention programs create housing stability plans with clients with the goal of ensuring housing stability after ESG assistance ends. DEHCR will continue to review and expand, when possible, the use of Tenant Based Rental Assistance funding.

DEHCR administers the Temporary Assistance to Needy Families (TANF) funded program that provides funding for homeless case management services at shelter facilities. This new program, established in 2017 Wisconsin Act 59, provides shelters with funding to connect homeless families with services to facilitate employment and transition towards self-sufficiency. In addition, DEHCR administers the state-funded Homeless Grants pilot program which provides municipalities with $75,000 to connect homeless individuals with permanent employment.

DEHCR and Wisconsin Economic Development Corporation (WEDC) will continue collaborative efforts with WHEDA and USDA-RD to help local communities, particularly in rural areas, increase their awareness of available programs and opportunities to leverage dollars to maximize both the impact of program funding and the quality of housing and community development.

In the Public Facilities for Economic Development Program and Economic Development Programs, priority will continue to be given to those projects that produce high wages and offer decent health insurance where the employer pays more than half the cost of the premiums. High wages are defined as an hourly amount that will provide for disposable income for a household after meeting basic shelter, food and health costs.

Actions planned to develop institutional structure

The need for CDBG housing and community development projects continues to exceed available funding. The allocation of CDBG CLOSE funds that will occur beginning in Program Year 2020 will allow the Division of Energy, Housing and Community Resources (DEHCR) to focus needed resources on housing and public facility projects without adversely affecting the Division's

ability to support appropriate economic development projects.

Under CDBG rules, DEHCR has enabled Units of General Local Government (UGLG) to retain the proceeds of loans made under the Economic Development and Housing programs as Revolving Loan Funds (RLF's). The Department, through the implementation of the CDBG-CLOSE program, has determined that the best course of action is to liquidate the remaining funding and to ultimately close all Revolving Loan Funds (RLF). UGLG's that currently administer an Economic Development Revolving Loan Fund are required to participate in the CDBG-CLOSE program.

Under the CDBG-CLOSE program, all locally held, and funded by a CDBG award made on January 1, 1992 or later, Economic Development Revolving Loan Funds will be held for UGLG's. These UGLG's will have non- competitive access to the funds to use as grants for eligible activities.

DEHCR also has HOME programs to complement existing networks of service providers. DEHCR continues its long-term support of stable non-profit organizations that provide services in areas covering most of the state. ESG is provided to regional groups of providers, requiring them to collaborate in application and service delivery. Collaborative efforts among local agencies are strongly encouraged in DEHCR homeless assistance applications. Training and technical assistance continue to improve the delivery of housing and homeless assistance.

DEHCR administers the Weatherization Assistance Program. Many of these grantees also administer DEHCR's HUD-funded activities. Activities consist of attic and sidewall insulation, air infiltration reduction, and heating system replacements. DEHCR also administers the Low-Income Home Energy Assistance Program and state-funded Public Benefits Program to assist households with heating assistance, emergency fuel assistance, counseling for energy conservation and energy budgets, and emergency furnace repair and replacement. Coordinated efforts and referrals between program areas are on-going and increasing.

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

In addition to the connections with WHEDA noted in several places in the Plan, DEHCR staff members will work with these other state agencies and entities:

- **Balance of State, Milwaukee, Dane, and Racine Homeless Continua of Care**
- **Council of State Community Development Agencies** (COSCDA)
- **Interagency Council** on Homelessness- Agencies involved with homelessness include Homeless Continuum of Care entities, the Departments of Health Services, Veterans Affairs, Workforce Development, Children and Families,

Corrections, Public Instruction, as well as representation by homeless service providers.

- **Inter-Tribal network**
- **Main Street Communities**
- **National Alliance on Mental Illness of Wisconsin** (NAMI WI)
- **Other State Agencies** (building code review, business development)
- **Refugee Network**
- **Statewide Independent Living Council**
- **University of Wisconsin-Extension** (tenant and homebuyer education)
- **USDA – Rural Development housing**
- **Weatherization Operators of WI**
- **WI Association of Housing Authorities**
- **WI Community Action Programs Association**
- **WI Council on Mental Health** (interagency forum that includes housing needs of mentally ill persons)
- **WI Council on Physical Disabilities**
- **WI Department of Health Services** (transitional and permanent housing for elderly persons and persons with physical, sensory, behavioral and developmental disabilities, and lead-based paint hazard programs).
- **WI Department of Natural Resources** (water/sewer connection funding in rural areas)
- **WI Department of Transportation**
- **WI Economic Development Association**
- **WI Economic Development Corporation**
- **WI Historical Society** (Federal Section 106 review process)
- **WI Rural Water Association**
- **WI Waste Siting Board**

Discussion:

The Division of Energy, Housing and Community Resources (DEHCR) staff members will participate in the following coalitions of public- and private-sector housing organizations:

Childhood Lead Poisoning Committee: A collaboration of public and private entities dedicated to eliminating lead-based paint hazards in housing. A strategic plan was adopted in 2004 and updated in 2006. Implementing and evaluating the Elimination Plan is actively ongoing.

Interagency Council on Homelessness: 2017 Wisconsin Act 74 created the Interagency Council on Homelessness, whose membership consists of all cabinet agencies with funding or programing that relates to homelessness in Wisconsin. In addition, the Council includes representatives from the Wisconsin Housing and Economic Development Authority and the four CoC's of the state. The Council will establish a statewide policy on preventing and ending homelessness and will report to the Governor and Legislature on its activities and progress towards meeting its goals.

WI Collaborative for Affordable Housing: This group covers information-sharing and training issues. It includes representatives from Legal Action of Wisconsin, HUD's Wisconsin Field Office, Wisconsin Association of Housing Authorities, Wisconsin Community Action Program Association, Wisconsin Partnership for Housing Development, WHEDA, USDA and other housing

organizations and local governments.

WI Fair Housing Network: This coalition focuses on fair housing education and promotion. Its membership includes representatives from the Wisconsin Equal Rights Division, Department of Safety and Professional Services, HUD's Wisconsin Field Office, WHEDA, Wisconsin Realtors Association, local boards of Realtors, equal opportunity commissions, fair housing councils, community housing resources boards and landlord and apartment associations.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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	
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	$16,136,191
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: **$16,136,191**

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.	85%
3. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate-income. Specify the years covered that include this Annual Action Plan.	1

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   DEHCR utilizes only forms of investment included in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   DEHCR provides the following guidelines for the resale or recapture of HOME funds; additional guidelines may be provided in the HHR or RHD manual as applicable. Certain restrictions must be placed on assisted homebuyer properties in order to

help preserve affordable housing. If ownership of a property is transferred during the affordability period, these provisions are triggered. Grantees have two options to ensure that the HOME subsidy originally invested in the property is used to preserve affordable housing: recapture or resale. Except when a grantee project consists of development subsidies only, with no direct subsidy to the homebuyer, then the grantee must use the resale provision since development subsidies are not subject to recapture.

RECAPTURE: These provisions apply when direct assistance is provided to the homebuyer. Recapture is a mechanism to recapture all or a portion of the direct HOME assistance if the recipient decides to sell the house within the affordability period at whatever price the market will bear. Under this option, the grantee may require the homebuyer to repay all of the HOME assistance received or may forgive part or all of the assistance over the term of the affordability period. The amount of repayment required and method of calculating the amount of repayment (if only partial repayment is required) must be clearly outlined in the written agreement with the homebuyer. Forgiveness must be tied to the length of time the homebuyer has occupied the home in relation to the period of affordability (i.e., the grantee would forgive 50% of the assistance amount for an owner who sold the home half-way through the period of affordability).

NET PROCEEDS: When the net proceeds are not sufficient to repay the direct HOME assistance and the homebuyer's investment, the net proceeds may be shared in either of two ways:

6. Recapture may be based on the ratio of the HOME assistance to the sum of the homeowner's investment (down payment and any capital improvement investment made by the owner since purchase), plus the HOME subsidy: *[HOME $/(HOME $ + Homeowner Investment)] x Net Proceeds = Recapture*
7. The homeowner's investment may be repaid in full before any HOME funds are recaptured.

The grantee may choose to use the available proceeds from the resale to repay the homeowner's investment first. The HOME assistance is then repaid to the extent that proceeds are available.

RESALE: This option ensures that the HOME-assisted property remains affordable for the entire period of affordability. If the unit is sold during the period of affordability, the sale must meet the following criteria: The new purchaser must be LMI and occupy the property as the family' principal residence. The sales price must be "affordable" to the new purchaser. Affordable is defined by the grantee. Affordable has been defined as a maximum percentage of the purchaser's income that can be used to pay the fixed costs of owning a home (i.e., loan payment of principal and interest, taxes and insurance--PITI.) Grantees must use deed restrictions or land covenants to enforce the resale restrictions.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

A period of affordability of units acquired with HOME funds will be followed per CFR 92.254(a)(4) and as outlined by the guidelines in the previous answer.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds

along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

DEHCR does not intend to use its HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

Housing Opportunities for Persons with AIDS Program (HOPWA)

Inserted under "Add Text" link

1. Identify the method of selecting project sponsors and describe the one-year goals for HOPWA-funded projects

   The Division of Energy, Housing and Community Resources issues a request for proposal for eligible HOPWA services. Applicants are chosen based on ability to provide HOPWA services, either directly or through subcontracts.

   Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family totals: 159

Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

   DEHCR recognizes that flexibility is needed to best serve various homeless populations in various areas of the state. Recipients and subrecipients of ESG funding must adhere to their area's HUD COC established written standards for each program type. If no such standards are established by the HUD COC, the recipient must develop and consistently apply written standards. All written standards must provide a clear policy or instruction for the items listed in (24 CFR § 576.400 (e)(3)) and must be approved by DEHCR.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

   Each HUD Continua of Care is required to develop and/or operate a centralized or coordinated intake or assessment system if any agencies in the Continua of Care receive Emergency Solutions Grant funding. Recipients and subrecipients must participate in the centralized intake for their continuum of care. If there is not yet a centralized intake, a recipient or sub-recipient must participate in its implementation and eventually its use.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations) will be allocated.

   ESG funds will continue to be distributed to one fiscal agent in each HUD or local Continua of Care on behalf of all project applicants in that continuum. The Continua of Care will be pre-defined, based on historical partnership for previous grant competitions within the DEHCR, the HUD COC process and geographic proximity.

   Each HUD or local Continua of Care will decide how to best allocate funding to participating agencies by considering local needs, program performance and parameters laid out through HEARTH and grant program rules.

4. If the 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.

To the maximum extent practicable, the recipient and subrecipients will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted by ESG.

5. Describe performance standards for evaluating ESG.

ESG funding is allocated using a funding formula which takes into account factors such as regional homelessness, local performance in preventing and ending homelessness, poverty levels, and other indicators of the extent of homelessness in each HUD and local Continua of Care. DEHCR utilizes the following performance measures to evaluate grantees in the funding formula, which incentivizes efficient and effective use of ESG funds, including percentage of exits to permanent housing, the percentage of returns to homelessness within a year, and the percentage of households with a household move in date (HMID). The ESG program will continue to measure the performance of recipients and sub-recipients and encourage the use of evidence-based practices in service delivery.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

■ Applications submitted by eligible recipients
Subgrantees that are State Agencies
Subgrantees that are HUD-CPD entitlement grantees

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter “N/A”.

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Please see attached Allocation Plan.

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Please see attached Allocation Plan.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see attached Allocation Plan.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes.

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes.

6. **Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes.

7. **Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

Please see attached Allocation Plan.

8. **Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

The grantee will use the HUD issued affordable homeownership limits. Please see attached Allocation Plan.

9. **Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. **HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

The grantee does not intend to use National Housing Trust Funds for homebuyer activities.

11. **Grantee Limited Beneficiaries or Preferences.** Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

Please see attached Allocation Plan.

12. **Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

Discussion:



STATE OF WISCONSIN

NATIONAL HOUSING TRUST FUND ALLOCATION PLAN

Fiscal Year 2026

Submission to the U.S. Department of Housing and Urban Development

State: Wisconsin FY 2026 HTF Allocation Amount: TBA

The National Housing Trust Fund (NHTF) program was established by Title I of the Housing & Economic Recovery Act of 2008 (HERA), Section 1131 (Public Law 110-289) to increase the construction and preservation of rental housing for extremely low-Income (ELI) households, including homeless families and individuals with special needs through formula grants to states. Fannie Mae and Freddie Max set aside 4.2 basis points of unpaid principal purchases. 65% of those set asides are dedicated to the NHTF program while the remainder is reserved for Capital Magnet Funds. Davis-Bacon wages were not made applicable to the NHTF program.

For years in which the total national funding is under $1 billion, 100% of each state's allocation must go towards benefiting extremely low income (ELI) households, specifically households at or below 30% of area median income or households with income below federal poverty level (greater of). DEHCR anticipates that 100% of funding will be targeted towards these rental households for the foreseeable future. The total national funding for 2026 is TBA.

The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) was designated by the Governor of the State of Wisconsin to be the administrator of the National Housing Trust Fund (HTF) program in Wisconsin. DEHCR will prioritize the use of NHTF to expand the overall number of housing units available to Extremely Low-Income households.

The state is required to submit an annual National Housing Trust Fund Allocation Plan. DEHCR reserves the right to make modifications to this proposal as new guidance is provided by the U.S Department of Housing and Urban Development (HUD). Additionally, should HUD change the allocation of HTF funds to Wisconsin, DEHCR reserves the right to proportionately modify the Allocation Plan.

Funding Availability

DEHCR anticipates allocating the PY 2026 award on a rolling basis throughout the year and in conjunction with the application process for HOME-Rental Housing Development awards. Requests for Proposals (RFPs) may be released describing eligible applicants, activities, threshold items, scoring priorities, application deadlines, and an overview of both the review and awarding process. DEHCR has identified the following objectives for the National Housing Trust Funds: expanding the quantity of extremely low- income housing by allocating dollars to both Housing Tax Credit properties and non-Housing Tax Credit multifamily developments. DEHCR will not be providing Housing Trust Funds to subgrantees.

Award Structure

National Housing Trust Fund awards are expected to be structured as grants or as loans, subject to repayment upon successful completion of the affordability period. Interest rates will be below-market rate. DEHCR may also choose to use up to one-third of the annual allocation for operating cost assistance and/or reserve to eligible rental housing subject to the HTF regulations 24 CFR § 93.201(e) or other structures permitted under HTF regulations.

Affordability Period

Applicants must commit to keeping HTF units affordable, including all applicable income, and rent restrictions, for a period of no less than 30 years from the point of project completion.

Maximum Per-Unit Subsidy

NHTF expenditures must be reasonable and based on actual costs. Maximum per-unit subsidy is the same as Wisconsin's 2026 HOME maximum per-unit subsidy limits as determined by HUD (Section 234 Basic Limits Per No. of Bedrooms).

The designation of HOME maximum per-unit subsidy limits is justified, reasonable, and appropriate under the NHTF interim rule. When establishing the per-unit subsidy limit, DEHCR reviewed construction data for HOME-Rental Housing Development (RHD) properties receiving a RHD award as well as LIHTC projects. DEHCR found a high level of correlation between the statewide development cost per unit across all regions of the state as compared to new construction projects. New construction properties are located statewide, and rehab properties may have wide variations in development budgets based on the amount of rehab that is required at any individual property. DEHCR's review of statewide development costs does not support consistently higher development costs in certain geographic areas over others. As utilization of the existing HOME subsidy limit is permitted under the HTF program, and statewide data does not demonstrate a significant statewide variation, DEHCR has opted to select the HOME per- unit subsidy limit for the HTF.

A review of projects will satisfy all HTF statutorily required considerations, including but not limited to an examination of sources and uses as well as a determination that all costs are reasonable. Subsidies provided shall not exceed eligible development costs by unit or the amount necessary for project feasibility through completion of the affordability period. Costs shall be deemed reasonable and not provide excessive profit to the developer.

Application Process

1. DEHCR intends to make an application packet available for the HTF program or may rely upon applications submitted for alternative resources where authorized. The application will include the funding criteria, as described but not limited to items on the following pages, application evaluation process, timeline for commitment and expenditure of funds, etc. Materials will be available on DEHCR's website: https://energyandhousing.wi.gov/Pages/Housing.aspx

2. Applicants will be evaluated by a staff level review committee and will be reviewed and selected with consideration being given to both the below threshold as well as priority funding criteria.

Threshold:

Applicants must meet all requirements of 24 CFR 93.2. Failure to respond or satisfy these requirements will result in removal from NHTF consideration.

Category	Description
Eligible Applicants	Eligible applicants include nonprofit or for-profit entities, Housing Authorities, and Tribal Housing Authorities. The applicant must be an owner or developer of the project applying for assistance.
Ability to Obligate Award	• Readiness to proceed: developers will be required to meet all deadlines established at time of application in order to adhere to HUD statutory commitment requirements. • Capacity of the development team, as well as a review of the depth of experience by each member of the development team, and past success in developing and managing affordable multifamily housing projects. ○ Applicants must demonstrate the ability and financial capacity to undertake, manage, complete, and meet all compliance requirements of the eligible activity.
Eligible Activities	NHTF may be used for the production, preservation, and rehabilitation of affordable rental housing. Eligible activities include, but are not limited to: acquisition, new construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities. More specifically, this includes real property acquisitions, site improvements, conversion, demolition, financing costs, and relocation expenses of any displaced persons. NHTF may be used for public housing in limited circumstances. A description of the eligible activity must be provided at time of application. Funds are not available to refinance existing debt secured to rental housing. DEHCR does not intend to use any NHTF funds for homebuyer activities. Therefore, there are no resale, recapture, or affordability provisions related to homebuyer activities.

Ability to undertake eligible activities in a timely manner	Applicants will be required to: • Make acceptable assurances that the applicant will comply with all state and federal requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities; • Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity; • Demonstrate its familiarity with the requirements of other federal, state, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and • Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to: o Own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development; or o Design, construct, or rehabilitate, and market affordable housing for homeownership.
Must meet Wisconsin Housing priority needs	Applicants must meet at least one of the State's Consolidated Plan housing priorities.

Financial Necessity of Subsidy	Applicants will be required to provide evidence that an award of National Housing Trust Funds is necessary for financial feasibility.

Priority Funding Criteria:

DEHCR will prioritize projects that advance strategic priorities determined by DEHCR. Applications will be evaluated based on the below characteristics; funding will be committed until all National Housing Trust Fund money has been allocated.

Category	Description
Geographic Diversity	Priority given to projects located in either an area identified by WHEDA as a "High Needs Area", on Federally designated Tribal Lands, Areas of Economic Opportunity, or a Workforce Housing Community – areas to be defined through WHEDA's current Qualified Allocation Plan for the Low-Income Housing Tax Credit program.

Use of Rental Assistance	The extent to which the project provides a higher number of units committed with federal, state, or local project-based rental assistance so that rents are affordable to extremely low-income families. Assistance may only be provided contingent upon applicants guarantee that residents will pay no more than 30% of their income towards rent. Commitments may include: • Section 8 or 515 project-based assistance; and • Other local, state, or federal project-based rental assistance or operating subsidy that limit tenant rental contribution to 30% of gross household income.
Priority Housing Needs of State	The extent to which properties will target households earning at or below 30% CMI and which are headed by veterans, persons with disabilities, and/or are experiencing or at risk of homelessness.
Leveraging	Extent to which application makes use of non-Federal sources. Eligible sources include state and local publicly controlled funds, land donated by state or local government, tax credit equity, deferred developer fees. Sources must be committed at the time of application.
Proportion of units designated as HTF units	Percentage of total project units designated as Housing Trust Fund units.

Performance Goals and Benchmarks

DEHCR expects that in PY26, NHTF will support approximately ___ new or preserved housing developments and will create approximately ___ units with rents affordable to extremely low-income households. Recipients will be responsible for compliance with applicable reporting, file and physical inspections, and record keeping requirements. *Final numbers TBA

DEHCR reserves the right to suspend all HTF applications and awards until HUD approves the Annual Action Plan and the HTF Allocation Plan.

Development Quality

DEHCR will require all projects funded with NHTF to meet applicable property standards upon completion. This includes all applicable state and local codes, ordinances, and zoning requirements. All projects must meet the following requirements:

- The Fair Housing and Americans with Disabilities Act:
  - Section 504 of the Rehabilitation Act: For newly constructed housing, a minimum of

five percent (5%) of the total dwelling units or at least one unit in a multi-family housing project, whichever is greater, shall be made accessible for persons with mobility impairments. An additional two percent (2%) of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments. For rehabilitation of existing housing: If alterations are undertaken to a housing facility that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, then five percent of the total dwelling units or at least one unit, whichever is greater, shall be made accessible for persons with mobility impairments. An additional two percent of the units (but not less than one unit) shall be accessible for persons with hearing or vision impairments. Alterations to dwelling units in a multi-family housing project (including public housing) shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with handicaps. If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible.

- Lead-Based paint provisions noted in 24 CFR part 35: For properties originally constructed before 1978: HTF recipients will be required to complete an inspection for the existence of lead-based paint. If lead-based paint is discovered, the rehabilitation plan must include the removal of the lead-based paint, or a detailed description of how the proposed renovation will comply with the EPA's Renovation, Repair and Painting Program. All rehabilitation must comply with HUD's Lead Safe Housing Rule (LSHR).

- Design and Construction requirements noted in 24 CFR 100.205.

An environmental review will be conducted to ensure that in addition to federal requirements noted above, properties receiving HTF resources must comply with the State's Environmental Barriers Act, the Wisconsin Accessibility Code, state statues, local zoning requirements, and all state and local building codes, including the standards for multifamily dwellings established in Administrative Code sections SPS 361-365.

DEHCR will not permit the permanent displacement of residents in properties receiving HTF resources. Temporary relocation of existing residents must comply with the Uniform Relocation Act.

DEHCR will not permit HTF resources to be used in buildings that are located within a 100-year flood plain. Portions of the site may be located in the 100-year flood plain but may not include parking areas or the footprint of the residential units or accessory buildings. All properties receiving HTF resources must comply with the State of Wisconsin Hazard Mitigation Plan, the 2021 edition of the International Building Code® and the International Existing Building Code®. The Hazard Mitigation plan can be found at https://wem.wi.gov/state-planning/

*Any process as listed above is subject to change based upon subsequent guidance as identified and provided by HUD.

Construction and Rehabilitation

Standards Rehabilitation Standards

For those properties using HTF resources for rehabilitation of existing housing, applicants must submit a Capital Needs Assessment (CNA) to document that the proposed rehab meets HUD's Uniform Physical Condition Standards (UPCS), and to bring all systems up to a reasonable useful life. All items identified as Level 3 or Health & Safety deficiencies on the "UPCS Condition Standards – Comprehensive Listing" (attached to this plan) will be required to be completed as part of the rehabilitation of the property. If Level 2 items are not included in the rehabilitation budget, deposits to a replacement reserve must be sufficient to complete the repairs at the estimated time identified in the Capital Needs Assessment. A detailed description of UPCS deficiencies can be found at https://www.federalregister.gov/documents/2000/12/08/00-31306/uniform-physical-condition-standards-and-physical-inspection-requirements-for-certain-hud-housing

All HTF properties will also be required to comply with Appendix A – Wisconsin HTF Rehabilitation Standards - which is included at the end of this document. The request for HTF resources will include a Scope of Work describing all rehabilitation to be completed. If the rehabilitation Scope of Work does not result in a useful life that is commensurate with the project's affordability period, the operating budget must show appropriate replacement reserve deposits for their future replacement when needed.

All rehabilitation proposals must comply with Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. Chapter SPS 366 can be found at Admin Code SPS 366 and http://codes.iccsafe.org/I-Codes.html.

The CNA must address imminent health and safety issues that must be corrected immediately, the condition of major systems (such as structural support, roofing, and plumbing), and the presence of lead-based paint. WHEDA's Capital Needs Assessment Policy is updated periodically, and include required formats for the assessment, along with the proposed scope of work. The Capital Needs Assessment policy can be found on https://www.wheda.com/LIHTC/Allocating/.

Newly-constructed properties must contain at a minimum the following features:

- Lever-style handles on all interior doors;
- Bath/kitchen faucets being replaced or initially installed must be single-lever type;
- Non-skid tub/shower pattern covering 75% of tub/shower floor;
- All walls within 36" of toilet and in tub/shower area shall have 3⁄4" plywood behind drywall to provide sufficient support for grab bars or other assist devices;
- Bathtub/shower stalls with offset controls;
- Low-profile thresholds – 1⁄4" maximum vertical height or 1⁄2" maximum beveled at 1:2 are required between ALL interior common areas and in all dwelling unit openings when floor transition height differs;

All newly constructed properties must meet or exceed the 2021 edition of the International Building Code®, the International Energy Conservation Code® or ASHRAE 90.1-2019. The 2021 IECC applies to new single family and low-rise multifamily housing and ASHRAE 90.1-2019 applies to mid- or high-rise multifamily (4+ stories).

Exhibit A

Wisconsin HTF Rehabilitation Standards
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A. Site Conditions

1. Site Drainage

a. There shall be positive surface water drainage away from all dwellings.

2. Concrete and Masonry

a. Cracks in concrete and/or masonry porches, steps or landings more than ¼ inch wide and change in elevation more than ½ inch tall shall be corrected.

b. Foundations: Cracking, spalling, excessive bowing (bulges vertically), sweeping (bulges horizontally), leaning, and mortar deterioration shall be corrected. Cracks 1/8 inch and larger shall be corrected.

3. Accessory Buildings

a. Health and/or Safety issues shall be corrected.

4. Trees and Shrubs

a. Landscaping shall not pose any health or safety hazard.

b. Trees near the foundation shall not cause an immediate or potential drainage and/or structural problem.

c. Excessive bushes and trees shall not cause health or safety hazards (overgrown areas).

d. Dead branches and/or trees, which pose a hazard of falling and/or causing personal harm or property damage, shall be removed.

5. Refrigerator/Stoves

a. It is recommended that the appliance(s) be replaced if any of the following conditions exist:

1. Broken or missing shelving.

2. Deteriorated seals.

3. Health and safety hazards.
4. Coolant leaks from the refrigerator.
5. Missing hardware (handles, controls knobs).
6. Inefficient or inoperable.

B. Exterior Wall Assembly Standards

a. All exterior walls shall be reasonably weather tight as to prevent moisture from entering the building and preventing heat from leaving the building.

c. All siding and exterior wall coverings shall be free of loose, cracked, broken and/or missing sections.

d. Painted surfaces shall be free of deteriorated paint.

e. Crawl space access panels and vents shall be in good repair.

f. Basement/Cellar doors and access panels shall be in good repair.

C. Floor Standards

1. Wood Floor Standards

a. Floors shall not excessively sag or become springy when live or dead loads are applied.

2. Floor Sheathing

a. Sheathing shall be in good repair and free from structural defects and tripping hazards.

3. Floor Finishes

a. Floor finishes shall be in good repair, securely fastened, and free of any tripping hazards.

b. Sub-flooring and cement floors, in living spaces, shall be covered with carpeting or other approved floor finishes.

4. Toilet, Bath, Shower, and Kitchen Spaces

a. When a new floor finish is installed in the kitchen, it shall extend under moveable appliances, including stoves and refrigerators.

D. Windows and Doors

1. Windows

a. Window panes that are cracked or broken shall be repaired or replaced.

b. Any deteriorated components of window units shall be corrected.

c. All windows shall have properly operating locks and hardware.

d. Damaged storm windows or screens creating a possible safety hazard shall be repaired or removed.

2. Interior/Exterior Doors

a. All door hardware shall be present and in good working condition.

b. Interior and exterior doors shall be in good condition.

c. Door units shall be weather-stripped to prevent air infiltration.

d. Doors shall be located in the following areas: attic areas where there is a staircase, bathrooms, shower rooms, and basement entrances.

E. Partition Standards

1. Wall Coverings

a. All wall coverings shall be securely fastened to the wall assembly.

b. Wall coverings shall be free from excessively loose material, large gouges, holes, and cracks.

c. Excessive amounts of loose or torn wallpaper shall be corrected.

2. Bathrooms and Kitchens

a. Bathtubs with showerheads and shower compartments shall be finished with a nonabsorbent surface. Such wall surfaces shall

extend to a height of not less than six feet above the floor.

b. If mildew is present, measures shall be taken to prevent future mildew as well as removing the current mildew.

F. Stair Standards

1. Stairs

a. Staircases and stairwells shall be in good repair.

b. Stairs shall not pose a tripping hazard.

c. Deteriorated, missing or otherwise defective tread, risers, stringers or the supporting structure shall be corrected.

2. Illumination

a. All exterior and interior stairways shall be provided with illumination of the stairs, landings, and treads.

b. Exterior stairways shall have an artificial light source located in the immediate vicinity of the top landing of the stairway.

c. Exterior stairways providing access to a basement from the outside grade level shall have an artificial light source in the immediate vicinity of the bottom landing of the stairway.

d. The control for the illumination of interior stairways shall be accessible in habitable areas without traversing any step of the stairway. The control for the illumination of exterior stairways shall be located inside the dwelling unit. Lights that are continuously illuminated or automatically activated are exempt from the control standards.

3. Handrails and Guardrails

Handrails

a. All interior and exterior stairways having four or more risers must have at least one handrail. Spiral and winding stairways shall have a handrail on the outside perimeter.
b. Handrails shall have a height of no less than 34 inches and no more than 38 inches, and shall be in good repair. Handrails shall be securely fastened to the floor and/or wall to support loads applied by people using the rails.

Guardrails

a. All unenclosed floor and roof openings, open sides of stairways, landings and ramps, balconies, decks or porches that are more than 30 inches above grade or floor below, and roofs used for other than service of the building shall be protected by a guardrail in accordance with Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®

G. <u>Ceiling Standards</u>

1. Ceiling Performance

a. Ceiling framing shall be in good repair and free from structural defects.

b. Acoustical tile and suspended ceilings shall be in good repair.

c. Ceilings that excessively sag shall be corrected.

d. Any bulging, holes, or loose plaster shall be corrected.

2. Attic Access

a. Existing access panels shall be weatherized and provide a weather-tight seal between the conditioned and unconditioned space.

3. Insulation Clearance

a. Combustible insulation shall be at least three inches from recessed lighting fixtures, fan motors, and other heating devices. However, when heat producing devices are listed for lesser clearances, combustible insulation complying with the listing requirements may be located at the distance specified by the heat producing device.

4. Exhaust Ducts and Plumbing Stack Terminations

a. All plumbing stacks shall continue through the roof, wall, or gable and not terminate in the attic. Plumbing stacks shall be in good repair.

b. Exhaust ducts shall be in good repair and continue through the roof, wall, or gable and not terminate in the attic.

H. Roofs

1. *Re*-roofing

a. Roof repairs to existing roofs and roof coverings shall comply with the provisions of the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code® Standing-Seam metal roof systems, that are designed to

transmit the roof loads directly to the buildings structure system and that do not rely on existing roofs and roof coverings for support, and comply with all provisions of Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®., are permitted.

2. Sheathing

a. Sheathing that is sagging, buckling, rotted, or not structurally sound shall be repaired and/or replaced.

3. Underlayments and Moisture Barriers

a. Where shingles or sheathing need to be repaired or replaced, the underlayment and moisture barrier must also be replaced according to Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

4. Shingles

a. Shingles must be replaced if one of the following exists: missing, excessive curling, cupping, or deterioration.

b. Shingles installed on a roof slope below Code requirements for shingles shall be removed and an approved covering installed.

5. Flat Roofs

a. Punctured, cracked, blistered, wrinkled, or otherwise distressed areas shall be corrected.

6. Flashing

a. Flashing shall be in good repair and used wherever the roof

abuts a wall or vent, around other extensions through the roof, and around masonry chimneys.

7. Gutters & Downspouts

a. Missing, sagging, or deteriorated gutters must be repaired or replaced.

b. Downspouts shall be color coordinated with gutters and shall be proportional in size to the drainage needs of the roof.

c. Gutters shall be supported as per the manufacturer's specifications with spikes and ferrules, wrap-around straphangers, or with hidden hangers.

d. Downspouts shall be securely attached to the house and connected to an exterior drainage system if one exists or installed in such a manner that storm water will drain away from the house and not result in washing, erosion, or damage to the foundation of the house. If there is no drainage system present, splash blocks or leaders shall be present.

I. Chimney Standards

1. General Performance

a. Any operable chimney must meet all applicable chimney requirements.

b. When an existing chimney is found not fit for its intended application it shall be repaired, rebuilt, lined, relined, or replaced with a vent or chimney to conform to the applicable code.

c. Inoperable and/or deteriorated chimneys, which pose a health/safety risk, shall be corrected or removed.

d. All empty or cracked mortar joints, including those in interior areas, such as basements and attics shall be tuck-pointed.

e. Solid fuel burning chimneys, for burning of wood or coal, shall be provided with spark arrestors (screens).

2. Flue Lining

a. All operable chimneys shall have flue liners in good condition.

3. Chimney Hood

a. The chimney hood shall have a height above the vent of at least 25 percent of the narrowest dimension of the vent. Hoods shall also be free from spalling or rust.

b. Minor spalling shall be repaired. If more than small portions are spalling, the hood shall be replaced. If a metal chimney hood has excessive rust, it shall be replaced.

J. Electrical

1. General

a. Standards exist in Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

2. Wiring

a. Existing wiring and equipment shall be in proper operating condition and pose no health or safety risk.

b. All wiring in areas other than the basement, unused attic areas, and garages shall be run in walls, wire mold or in conduit.

c. A new or old service shall be grounded to a ground rod.

d. Circuit extensions made with flexible cord wiring in lieu of permanent wiring shall be eliminated.

e. Copper wiring shall have proper connections to aluminum wiring. It is recommended that aluminum wiring be replaced with copper wiring when possible.

3. Receptacles

a. All damaged or inoperable receptacles shall be replaced. Broken cover plates shall be replaced.

b. Replacement of an existing non-utility or non-appliance two-prong receptacle may be with a 15-ampre non-grounding type receptacle.

c. New or existing grounding type receptacles must be grounded or meet the current requirements of the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®..

d. Existing baseboard receptacles properly set are acceptable.

e. Any equipment or appliances with grounded plugs shall have immediate access to a proper size grounded receptacle.

4. Lighting

a. A permanently installed light fixture controlled by a wall switch is required in the kitchen, bathroom, basement, stairwells, and hallways.

b. Light fixtures shall be installed properly and have a shield/globe installed.

K. Plumbing

1. Water Distribution System

a. Please ensure that anyone performing plumbing work meets the proper licensing requirements as required by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. or local jurisdictions.

b. Dwelling units shall be served by an approved sanitary sewage disposal system.

c. Leaking drain or supply lines, the presence of lead piping, failed polybutylene joints or pipes, low water pressure, or corroded or broken pipes shall be repaired or replaced. Any cross connections or siphonage between fixtures shall be corrected.

d. There shall be a properly operating main shut-off valve on the house side of the

meter.

e. Replacement sill-cocks shall be freeze-proof and/or have a shut-off valve located and in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®..

2. Drain, Waste, and Vent System

a. Leaks; clogged, slow, or non-working drains; or odors and any cross connections or siphonage between fixtures shall be corrected. Supplies that are located below the overflow drain must be corrected.

b. Horizontal drainage piping shall be installed in uniform alignment at uniform slopes.

c. The size of drainage pipe shall not be reduced in the direction of flow.

3. Hot Water Supply System

a. Each dwelling unit shall have a water heater located, equipped, and installed in accordance to the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

b. A discharge pipe, no less than the diameter of the relief valve inlet, shall be installed not less than six inches from the floor. The end of the discharge pipe shall not be threaded.

4. Fixtures and Faucets

a. Kitchen Sink. Any sink rusted, severely chipped or with badly worn enamel or not in good repair shall be corrected.

b. Lavatory Sink. A rusted, severely chipped or badly worn enamel or not in good repair shall be corrected. The lavatory sink may be

located in the same room as the flush water closet, or, if located in another room, it shall be in close proximity to the water closet compartment.

c. Bathtub/Showers. A rusted bathtub and/or shower unit or one that is chipped or has badly worn enamel, or not in good repair shall be corrected.

d. Flush Water Closet. The water closet shall be in good repair and securely installed. All water closets, existing or newly installed, shall have a functioning shut-off valve.

L. HVAC Standards

1. Controls

a. Each thermostat shall be functional and user friendly.

b. Each gas and oil combustion system shall have a master switch that serves as an emergency shutoff for the HVAC burner. The switch shall be easily accessible by the client in case an emergency shutoff is necessary. The switch shall also be in the line of sight of the appliances it controls.

Fuel Supply and Piping

c. Piping shall be properly supported, but not supported by other piping. A sediment trap shall be located as close as practical to the inlet of each combustion appliance (illuminating appliances, ranges, dryers, and outdoor grills need not be equipped). Shutoff valves shall be installed where required by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the
International Fuel Gas Code® and the International Existing Building Code®. and have easy access, be user friendly, and be protected from damage.

d. Piping shall be supported with appropriate hangers for the size of pipe. Supports shall be at such an interval and strength to prevent or dampen excessive vibration. Pipe supports shall be installed so movement of the pipe being supported will not detach them.

2. Combustion Heat (Forced Air Systems only)

Basic Conditions

a. The unit must have the minimum manufacturer's requirements in front of the unit for maintenance. The unit shall also be free from rust or other physical damage. The heat exchanger must be free from cracks or other openings. Barometric draft regulators shall be located above the unit or on the vent or vent connector in oil burning appliances.
b. The heating system must be capable of heating all habitable rooms, bathrooms, and water closets to a temperature of at least 70° F for a local design temperature at a distance of 36 inches above floor level.
c. Combustion air requirements shall be in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code®

and the International Existing Building Code®.

Vents

General Conditions

a. Vents shall be sized to properly exhaust all combustion products outdoors. Vents shall also consist of the appropriate vent type for the combustion appliance(s) being vented. Vents shall be free from damage or rust and be tightly connected.

b. Vents shall be properly supported so that they are generally vertical and comply with the listed clearance to combustible materials of the vent.

c. Direct vent sealed combustion; power venting, and other approved methods of venting are permitted if they are installed according to manufacturer's instructions.

Vent Termination

a. Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code® govern.

b. Vents must terminate vertically unless direct vent sealed combustion, power venting, or other approved methods of horizontal venting are used and installed according to manufacturer's instructions.

Vent Connectors

a. Vent connectors shall be sized to properly vent combustion products. Vents shall also consist of the appropriate vent type for the combustion appliance(s) being vented. Vents shall be free from damage or rust and be tightly connected. All segments of vent connectors shall be accessible at all times.

b. Vent connectors shall be properly supported and have a minimum slope of $^1/_4$ inch per foot and comply with the listed clearance to combustible materials of the vent.

Electric Heat Observable heat source

a. All heating elements shall be functional. Heating units shall also be in good condition. The heating system must be capable of heating all habitable rooms, bathrooms, and water closets to a temperature of at least 70° F for local design temperatures at a distance of 36 inches above floor level. Heating elements shall have good connections and no damaged or charred wires. Aluminum shall not be used as wiring unless specified by the manufacturer.

b. Any heating element that does not adequately heat shall be checked to make sure the connections to the element are satisfactory and that the relay is not malfunctioning.

3. Cooling

a. Central air conditioners shall be in good, working condition.
b. Unit/Window and Packaged terminal air conditioners shall have a tight seal around the unit and be properly supported. Unit/Window air conditioners shall also be properly grounded.
c. If a heat pump is equipped with a reversing valve, it shall function properly.
d. Bent fins on air conditioners should be combed to straighten them. The condensate shall be properly drained so that moisture problems are not created. Fiberglass shall not be used as an air sealant around window/unit air conditioners. Both indoor and outdoor coils should be clean. Suction lines should also be insulated to prevent possible moisture problems.
e. A disconnecting means shall be installed in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

4. Distribution Systems

a. The following conditions shall be followed:

1. Duct systems shall be intact, supported properly, and well sealed.

2. Air shall be allowed to flow freely from supply registers into return registers.

3. When furnaces are converted from a gravity fed heating system to a forced air system the duct system should be reconfigured and properly sized so that the heating system functions properly.

4. Duck tape shall not be used to seal or connect ducts.

b. When possible, supply and return registers shall be located in the same room, except for bathrooms or kitchens. No returns should be located in bathrooms and kitchens. If supplies and returns cannot be in the same room, measures must be taken to allow for air to flow from supplies to a return even if doors are closed separating the rooms. Grills and louvers are two methods of allowing air to flow from room to room.

M. Ventilation

1. Minimum Ventilation Standards

a. All habitable rooms shall be provided with natural or mechanical ventilation.

b. Louvers, windows and doors shall be able to let air pass freely between the room and the outdoors.

c. Exhaust fans must terminate outdoors and not in the attic. Excessive amounts of exhaust ductwork shall be avoided.

Bathrooms

a. Bathrooms that have a tub or shower shall be ventilated.

b. Windows must have at least 1.5 square feet of area that air can pass through if mechanical ventilation is not available.

c. Ventilated air shall be exhausted directly outside and not terminate in any other part of the building.

d. Any ductwork passing through attics shall be insulated.

Clothes Dryer Exhaust
General

d. Dryer exhaust systems shall be independent of all other systems; shall convey the moisture to the outdoors and shall terminate on the outside of the building. Screens shall not be installed at the duct termination. Transition ducts shall not be concealed within

construction.

e. Exhaust ducts shall not be connected with sheet-metal screws or fastening means which extend into the duct.

f. Exhaust ducts shall be equipped with a backdraft damper.

g. Exhaust ducts shall be constructed according to Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®, having smooth interior surfaces with joints running in the direction of the airflow.

h. Flexible transition ducts used to connect the dryer to the exhaust duct system shall be limited to single lengths, not to exceed eight feet in length, and shall be listed and labeled in accordance with UL 2158A.

i. Exhaust duct terminations shall be in accordance with the dryer manufacturer's installation instructions.

Lint collector

a. All ducts expelling lint shall be provided with a lint collector unless the dryer is already equipped with one.

b. Lint collectors shall be installed according to manufacturer's instructions.

Exhaust duct size

a. The minimum diameter of the exhaust duct shall be as recommended by the manufacturer and shall be at least the diameter of the appliance outlet.

Exhaust clearance

a. Exhaust ducts for clothes dryers shall have a clearance of at least one inch from combustible materials.

Length limitation

a. The maximum length of a clothes dryer exhaust duct shall not exceed the limits in Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

2. Range Hoods

a. Range hoods for gas stoves that discharge to the outdoors must be through a single wall duct. The duct serving the hood shall be airtight and shall be equipped with a backdraft damper. Ducts serving range hoods shall be constructed of galvanized steel or stainless steel and not terminate in an attic or crawl space or areas inside the building.

b. Variations can be made where installed in accordance with the manufacturer's installation instructions, and where mechanical or natural ventilation is otherwise provided

3. Overhead exhaust hoods

a. Overhead exhaust hoods shall discharge to the outdoors and shall be equipped with a backdraft damper. Broiler units incorporating an integral exhaust system, and listed and labeled for use without an exhaust hood, need not be provided with an exhaust hood.

b. Domestic open-top broiler units shall be provided with a metal exhaust hood, not less than 28 gauge, with a clearance of not less than 0.25 inch between the hood and the underside of combustible material or cabinets. A clearance of at least 24 inches shall be maintained between the cooking surface and the combustible material or cabinet. The hood shall be at least as wide as the broiler unit and shall extend over the entire unit and be centered over the unit

N. Fire Safety

1. Emergency Escape and Rescue Openings

a. Emergency escape and rescue opening shall comply with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

2. Exits

a. Exits shall comply with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®..

3. Smoke Alarms

a. Individual dwelling units shall be provided with smoke alarms as required by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

O. Hazardous Materials

1. Asbestos

a. Requirements set forth in the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

2. Lead-Based Paint – See 24 CFR part 35.

P. Energy Efficiency

1. Exterior Walls

a. Walls should be insulated in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which

incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. when any of the following activities occur:

1. New walls,
2. Walls that have become exposed during rehabilitation, and
3. If the exterior covering is removed.

2. Attics/Ceilings

a. Attic areas are governed by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

b. Insulation should be installed in accordance to manufacturer's specifications. All insulation in the attic should meet the appropriate fire safety codes. Thorough air sealing of the attic floor must be accomplished prior to addition of insulation.

3. Ductwork

a. All supply and return air ducts and plenums shall be insulated according to the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

4. Piping

a. All piping serving as part of a heating or cooling system shall be thermally insulated in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which

incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

5. Air Sealing

a. Exterior joints, seams or penetrations in the building envelope, that are sources of air leakage, shall be sealed.

Q. *Special Needs*

1. Please refer to the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2018 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. for uniform design, construction and alteration of buildings, so that physically handicapped persons will have ready access to and use of them in accordance with the Architectural Barriers Act, 42 U.S.C. 4151-4157.

Appendix - Alternate/Local Data Sources

1	**Data Source Name** 2015-2017 American Community Survey
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set. Data was found using the American Community Survey website for the State of Wisconsin. Information about the American Community Survey can be found at their website: http://www.census.gov/acs/www/
	What was the purpose for developing this data set? Not applicable
	Provide the year (and optionally month, or month and day) for when the data was collected. Not applicable
	Briefly describe the methodology for the data collection. Not applicable
	Describe the total population from which the sample was taken. Not applicable
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Not applicable
2	**Data Source Name** 2017-2019 American Community Survey
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set. Data was found using the American Community Survey website for the State of Wisconsin. Information about the American Community Survey can be found at their website: http://www.census.gov/acs/www/

	What was the purpose for developing this data set? Not applicable
	Provide the year (and optionally month, or month and day) for when the data was collected. Not applicable
	Briefly describe the methodology for the data collection. Not applicable
	Describe the total population from which the sample was taken. Not applicable
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Not applicable
3	**Data Source Name** Areas Lacking 25/3 Mbps Service Overlaid With CDBG Low-and Moderate-Income Population by Block Group
	List the name of the organization or individual who originated the data set. Public Service Corporation of Wisconsin
	Provide a brief summary of the data set. Data visually identifies areas of Wisconsin that lack broadband internet access and may qualify as 51% or more low-and moderate-income.
	What was the purpose for developing this data set? Planning purposes for identifying areas of potential CDBG investment for broadband access.
	Provide the year (and optionally month, or month and day) for when the data was collected. 2024
	Briefly describe the methodology for the data collection. Overlays 2021-2023 ACS data with Federal Communications Commission's Form 477.
	Describe the total population from which the sample was taken. Statewide
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Statewide

4	**Data Source Name** Areas Lacking 10/1 Mbps Service Overlaid With CDBG Low-and Moderate-Income Population by Block Group
	List the name of the organization or individual who originated the data set. Public Service Corporation of Wisconsin
	Provide a brief summary of the data set. Data visually identifies areas of Wisconsin that lack broadband internet access and may qualify as 51% or more low-and moderate-income.
	What was the purpose for developing this data set? Planning purposes for identifying areas of potential CDBG investment for broadband access.
	Provide the year (and optionally month, or month and day) for when the data was collected. 2024
	Briefly describe the methodology for the data collection. Overlays 2021-2023 ACS data with Federal Communications Commission's Form 477.
	Describe the total population from which the sample was taken. Statewide
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Statewide