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State of Wisconsin
Department of Administration
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Consolidated Annual Performance And Evaluation Report

April 1, 2025- March 31, 2026

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

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CR-05 GOALS AND OUTCOMES-91.52 (A)

Progress the jurisdiction has made in carrying out its Strategic Plan and its Action Plan

CDBG

The number of businesses assisted with CDBG economic development program (CDBG-ED) funds was higher than anticipated. Under the current lending environment, businesses are finding that the underwriting, compliance, and long-term reporting commitments required for CDBG-ED funding in some cases outweigh the higher interest payments associated with certain conventional loans. DEHCR has worked with stakeholders to raise awareness of the program through hosting training sessions and providing technical assistance to local governments and consultants. In addition, multiple pre-application meetings were held with potential grant applicants to discuss the details and requirements of potential applications. DEHCR has also updated its policies to make CDBG-ED funds less burdensome with the hopes of stimulating interest in the program. These efforts were successful in PY 25 to increase interest and exceed the goals of the program.

DEHCR provided training through the annual application and implementation trainings. During PY 2022, DEHCR finalized the CDBG-CLOSE program. DEHCR will continue to monitor the use of CDBG-CLOSE funds to ensure conformance with all applicable regulations. With the transition to all grants made from CDBG-ED funds, DEHCR has resolved the issues surrounding CDBG-ED awards.

The number of communities assisted with CDBG Planning (CDBG-PLNG) remains low. DEHCR staff promotes the planning program through contact with consultants, units of local government staff, and providing presentations at professional organization events. Planning utilization has historically been a challenge due to projects needing to meet a national objective and result in an eligible activity outcome. DEHCR accepts PLNG applications on an on-going basis to stimulate interest in the program. Both the CDBG-ED and CDBG-PLNG programs were promoted by program staff at the Wisconsin Rural Development Partners Network (WRDP) Workshop in Stevens Point, WI in June 2025; Wisconsin Rural Development Forum in Adams County, WI in October 2025; and the Wisconsin Economic Development Corporation (WEDA) Governor's Conference on Economic Development in Milwaukee, WI in January 2026.

The number of people assisted with CDBG funds for public facilities projects (CDBG-PF) did not meet expectations. DEHCR received 25 accepted applications in the 2025 program year and funded 21. The CDBG-PF program continues to be in high demand with many non-entitlement communities facing challenges with aging public infrastructure. DEHCR anticipates the high demand for CDBG-PF dollars to continue in the coming years.

Through the tenth full year of operation under the CDBG Housing Regions program (CDBG-H), program funds and services were made available to all eligible Wisconsin communities. This effort assisted in meeting geographic needs of the program. Contracted grantees were required to meet minimum low-income (30 percent of funds expended) thresholds to target and provide services to that population.

During PY 20, CDBG-CV funds were received to prevent, prepare for, and respond to COVID-19. Eligible CDBG-CV programs in this CAPER continued from the prior program year. During PY 25, the following objectives were met: create suitable living environments.

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HOME

The average amount of HOME-HHR assistance provided to homebuyers in Program Year 2025 was higher than planned by approximately 9 percent ($24,074 planned versus $26,241 actual) which is outside the variance rate for the program. Higher assistance amounts were needed to meet affordability goals. To make more homes affordable to Low-Moderate Income (LMI) families, a greater supply of available housing was required.

The average amount of assistance provided to homeowners for rehabilitation in Program Year 2025 was higher than planned ($47,360 planned versus $55,648 actual) which is outside the variance rate for the program. The higher cost can be attributed to scope of work that needs to be done coupled with local market conditions. Again, a lack of available houses to rehabilitate was experienced in Wisconsin.

HOME-RHD accepted applications during a rolling period in 2025. Applications were accepted the first Monday of every month between February and November with a total of 3 new applications received and executed 7 new contracts. HOME-RHD funding provided for construction, and/or rehabilitation of 116 affordable rental units.

HOME-TBRA provided rental assistance to 488 households which were homeless or at risk of homelessness. Households served were below goals for the program year and the total amount of assistance provided to households was significantly lower than in PY 24. This lower assistance can be attributed to the availability of other rental assistance programs, limited affordable housing inventory, and increasing rent costs and security deposit requirements. Lack of available, affordable housing coupled with low Fair Market Rental rates contributed to the State's inability to serve additional households during PY 25. DEHCR increased the number of grantees awarded TBRA funding in PY 25 through a competitive application process to 18 up from 15 awarded TBRA funding in PY24.

All HOME TBRA grantees are required to affirmatively market their programs to all qualifying members of their target populations, which include people who are homeless or at risk of homelessness. Through program efficiencies undertaken in Substantial Amendment #4, the State has considerably expanded its service area and numbers of households served through the HOME- TBRA program. The state also continued a service approach which required grantees to cover more than one county. Program year 2025 grantees' received contracts after a competitive application to provide additional coverage and opportunity for recipients to fully utilize funding.

ESG

The ESG program has made significant progress towards its goals. The ESG program overall served more than the overall total number of persons anticipated in each of the goals; however, the number of households or persons served varied between the different goals or ESG project types compared to the Action Plan goals. Many more persons were served with shelter and other services compared to goals. Homelessness prevention and tenant-based rental assistance/rapid re-housing did not meet their goals. There are several explanations for this.

- The number of people assisted in emergency shelters is lower than last year, but still higher than expected. Shelters continue to operate at a higher level since the pandemic, and the lessening of COVID restrictions has allowed for higher shelter capacity. The continued lack of affordable housing has also likely contributed to the increased need for emergency shelter.

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- There has been a rise in unsheltered homelessness across the state which has led to an increased need for street outreach services.

- There was a increase in people served with homelessness prevention resources. This is likely due to the lack of affordable housing and the limited rental market. Less households are able to be served due to high rents above Fair Market Rent.

- Rapid re-housing providers across the state are having difficulties identifying housing for clients to move into. A lack of available rental housing across rural Wisconsin is preventing greater successes. This prolongs periods of homelessness and means that fewer households are served. Providers are working on this issue by trying to engage landlords, and work with households to address barriers to housing.

- Emergency shelters are focused on prioritization using coordinated entry and diversion. This means some households who have low barriers to housing may not be enrolled in a rapid re-housing program because they are capable of obtaining housing quickly on their own. This frees up resources to serve clients with more significant housing barriers, who likely need much more rapid re-housing assistance than a client with lower barriers to housing. This causes the program to have a higher cost per person; however, overall will result in more persons in the state exiting homelessness.

HOPWA

Short-term rental, mortgage, utility, TBRA, and supportive services assistance was provided to 138 households with HOPWA funding.

HTF

DEHCR submitted the 2025 allocation plan, with the goal of creating 74 units through the Housing Trust Fund program for extremely low-income households. WHEDA and DEHCR conducted one competitive round of applications for the allocation of HTF, in concurrence with the LIHTC application cycle, in December 2025. WHEDA and DEHCR also conducted a competitive application cycle for any projects serving extremely low-income residences in the spring of 2025.

During PY 25, twelve projects supported with HTF funding completed construction resulting in a total of 731 new units placed into service, of which 132 were HTF-funded units. In addition, during the program year, there were eight projects funded from previous allocations of Housing Trust Funds that closed on the funding, resulting in 462 units that are currently under construction, of which 111 will be designated as HTF units.

HOME-ARP

DEHCR accepts HOME-ARP applications on a continuous basis. During PY 25, DEHCR received 11 applications. Four preliminary awards were made during the program year, one additional award was made subsequent to the close of the program year and DEHCR is currently in the process of reviewing six applications. The average cost per completed unit was $292,903 in PY 25. DEHCR expects to award all HOME-ARP funds given the interest in the program experienced to date.

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Accomplishments – Program Year

Goal	Category	Outcome

Rehabilitate Owner Occupied Housing — Affordable Housing

Indicator	Expected	Actual	Unit of Measure	Percent complete
Homeowner Housing Rehabilitated	736	337	Household Housing Unit	45.79%

Rehabilitate Rental Housing — Affordable Housing

Indicator	Expected	Actual	Unit of Measure	Percent complete
Rental units rehabilitated	177	51	Household Housing Unit	28.81%

Build New Rental Housing — Affordable Housing

Indicator	Expected	Actual	Unit of Measure	Percent complete
Rental units constructed	88	214	Household Housing Unit	243.18%

Provide Down Payment Assistance to Homebuyers — Affordable Housing

Indicator	Expected	Actual	Unit of Measure	Percent complete
Direct Financial Assistance to Homebuyers	410	78	Households Assisted	19.02%

Provide Tenant-Based Rental Assistance — Affordable Housing

Indicator	Expected	Actual	Unit of Measure	Percent complete
Tenant-based rental assistance / Rapid Rehousing	2,395	488	Households Assisted	20.38%

Provide Homeless Assistance — Homeless

Indicator	Expected	Actual	Unit of Measure	Percent complete
Tenant-based rental assistance / Rapid Rehousing	1,638	1,232	Households Assisted	75.21%
Homeless Person Overnight Shelter	14,000	15,976	Persons Assisted	114.11%
Homelessness Prevention	4,000	2,448	Persons Assisted	61.20%
Other	1,000	1,561	Other Households Assisted	156.10%

***No longer a valid project type within HMIS; replaced with Services Only**

Assist Communities with Public Facilities Projects — Non-Housing Community Development

Indicator	Expected	Actual	Unit of Measure	Percent complete
Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	75,481	33,575	Persons Assisted	44.48%

Create Jobs Through ED Assistance and Job Training — Non-Housing Community Development

Indicator	Expected	Actual	Unit of Measure	Percent complete
Jobs created/retained	38	105	Jobs	276.32%

Increase Housing Options for Persons with HIV/AIDS — Non-Homeless Special Needs

Indicator	Expected	Actual	Unit of Measure	Percent complete
Tenant-based rental assistance / Rapid Rehousing	147	133	Households Assisted	90.48%

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Assist Communities with Emergency Assistance	Affordable Housing Non-Housing Community Development	**Indicator**	**Expected**	**Actual**	**Unit of Measure**	**Percent complete**
		Households Assisted	51	0	Households Assisted	0.00%
Assist Communities with Local Planning	Non-Housing Community Development	**Indicator**	**Expected**	**Actual**	**Unit of Measure**	**Percent complete**
		Other	11	4	Other	36.36%
Special Projects	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	**Indicator**	**Expected**	**Actual**	**Unit of Measure**	**Percent complete**
		Other	1	1	Other	100.00%

Table 1 – Accomplishments – Program Year

Accomplishments – Strategic Plan to Date

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Goal	Category	Funding	Outcome

Goal	Category	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
Rehabilitate Owner Occupied Housing	Affordable Housing	CDBG	$47,947,548.00	Homeowner Housing Rehabilitated	736	337	Household Housing Unit	45.79%
		HOME	$10,533,180.00					
Rehabilitate Rental Housing	Affordable Housing	CDBG	$384,221.00	Rental units rehabilitated	177	51	Household Housing Unit	28.81%
		HOME	$12,339,149.00					
		HTF	$4,860,636.00					
Build New Rental Housing	Affordable Housing	HOME	$24,678,299.00	Rental units constructed	88	214	Household Housing Unit	243.18%
		HTF	$19,442,544.00					
Provide Down Payment Assistance to Homebuyers	Affordable Housing	CDBG	$12,151,082.00	Direct Financial Assistance to Homebuyers	410	78	Households Assisted	19.02%
		HOME	$14,545,820.00					
Provide Tenant-Based Rental Assistance	Affordable Housing	HOME	$25,256,279.00	Tenant-based rental assistance / Rapid Rehousing	2,395	488	Households Assisted	20.38%
Provide Homeless Assistance	Homeless	ESG	$18,448,740.00	Tenant-based rental assistance / Rapid Rehousing	1,638	1,232	Households Assisted	75.21%
				Homeless Person Overnight Shelter	14,000	15,976	Persons Assisted	114.11%
				Homelessness Prevention	4,000	2,448	Persons Assisted	61.20%
				Other	1,000	1,561	Other Households Assisted	156.10%
Assist Communities with Public Facilities Projects	Non-Housing Community Development	CDBG	$67,569,923.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	75,481	33,575	Persons Assisted	44.48%
Create Jobs Through ED Assistance and Job Training	Non-Housing Community Development	CDBG	$6,624,502.00	Jobs created/retained	38	105	Jobs	276.32%
Increase Housing Options for Persons with HIV/AIDS	Non-Homeless Special Needs	HOPWA	$3,906,835.00	Tenant-based rental assistance / Rapid Rehousing	147	133	Households Assisted	90.48%

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Assist Communities with Emergency Assistance	Affordable Housing Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	$10,599,204.00	Households Assisted	51	0	Households Assisted	0.00%
		Other	$15,355,000.00					
Assist Communities with Local Planning	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	$1,324,900.00	Other	11	4	Other	36.36%
Special Projects	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	$7,949,403.00	Other	1	1	Other	100.00%
		HOME	$0.00					

Table 2 – Accomplishments – Strategic Plan to Date

Assess how the state's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified

CDBG

The annual application and implementation training provided by DEHCR have aligned with community needs for infrastructure upgrades. Annual training sessions yielded 30 CDBG applications and 26 awarded projects, including CDBG-CV, with 134 trainee registrations and additional training participants who did not register, as registration was optional for most participants. The trainings included 71 registrants for the annual Implementation Training held in September 2025 and 63 registrants for the annual PF/PLNG Application Training held in February 2026. An opportunity exists to emphasize additional CDBG-PLNG and CDBG-ED funding availability with community stakeholders during the training programs. DEHCR also has identified the need for additional marketing throughout the state to utilize available funds and to meet program goals.

The use of CDBG-H funds as no-interest loans assists low- and moderate-income households to address structural needs they might not otherwise be able to afford and meets state priorities of serving both rental units and owner-occupied units. The program requires a pre- and post-construction inspection to guarantee finished projects meet safe and sanitary guidelines, particularly in the area of lead-safe rehabilitations, which is identified as a program and statewide priority. The CDBG funding has enabled communities throughout the state to make essential street and utility infrastructure improvements, provide public services, and complete long-range planning in LMI areas.

HOME

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The state uses about 50 percent of HOME funding to provide affordable housing for single families throughout Wisconsin. HOME HHR funding is distributed by regions; 58 percent is for homebuyer down payment assistance and 42 percent is for owner occupied housing rehabilitation. To meet the goals and objectives, contracts are awarded on a competitive basis to non-profit organizations and local units of government statewide. Each grantee is then monitored annually to ensure all HOME requirements are being followed correctly.

HOME-RHD continues to provide much needed affordable rental housing. HOME-RHD provides critical housing opportunities for extremely low-income individuals and families as well as low to moderate income families and individuals. HOME-HHR continues to provide opportunities for rehabilitation and purchasing of homes to provide affordable housing.

HOME-TBRA target populations in 2025 were chronically homeless individuals and families, homeless individuals and families with a disability, individuals and families who are at risk of homelessness, and other special needs as designated by the local homeless coalitions and outlined in a specific grant application. As a result, the majority of HOME-TBRA participants are homeless or at risk of homelessness. HOME-TBRA grantees are required to affirmatively market their HOME-TBRA programs to all members of their target populations, which necessarily include people who are homeless or at risk of homelessness. They are also required to identify those target populations least likely to apply for HOME-TBRA and determine what special outreach activities will ensure they are fully informed about HOME-TBRA. Substantial Amendment #4 to the 2015-2019 Consolidated Plan made changes to eligibility criteria that become effective in program year 2019. As a result, DEHCR was able to dramatically increase the numbers of persons served by HOME-TBRA. Unfortunately, the competitive housing market and the COVID-19 pandemic were major factors in rent increases and the shortage of affordable units available for rent during PY 25. Lack of safe, sanitary, and affordable rental inventory throughout the entire state of Wisconsin prevented the State from meeting its goals for households served.

HOPWA

Vivent Health (formerly named AIDS Resource Center of Wisconsin), the project sponsor for the state formula HOPWA grant, provides short term rental, mortgage and utility assistance and supportive services to clients. The majority of clients had income and were insured and connected to care; stability in housing staff and collaboration with partner agencies has assisted in this outcome. Vivent Health reports benefitting from the HOPWA Institute to make important revisions to the housing procedures and policies manual. Short-term rental, mortgage and utility assistance, supportive services and TBRA was provided to 138 households with HOPWA funding.

HTF

DEHCR established specific objective priorities in the annual Housing Trust Fund allocation plan. In 2025, the allocation plan outlined the priorities of ensuring additional units targeted to the extremely low-income population are created within specific parameters. These include projects being located in specific geographic locations, projects utilizing rental assistance subsidies, ensuring projects remain affordable for an extended period of time, incentivizing projects to developers under the scope of Wisconsin's housing policy priority needs to serve households at or below 30% CMI headed by veterans, persons with disabilities and/or impacted by homelessness, and the use of non-federal funds. The annual allocation plan also promoted the rehabilitation of HUD and RD properties along with limiting the Housing Trust Fund request a project makes.

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DEHCR and the Wisconsin Housing Economic Development Authority awards applications points for being in certain geographic areas. These include High Need Areas, rural areas without recent Housing Tax Credit awards and Workforce Housing Communities. All areas are defined by WHEDA's Qualified Allocation Plan for the Housing Tax Credit program.

The 2025 Allocation plan promoted projects to incorporate federal, state, or local project-based rental assistance. Forms of rental assistance could include Section 8 or Section 515 project-based assistance, project-based vouchers, 811 vouchers, NAHASDA funding for rental assistance, or similar project-based rental assistance or operating subsidy.

All projects awarded Housing Trust Fund dollars in 2025 will enter a Land Use Restriction Agreement upon closing on the funds. The LURA will remain in place for 30 years.

Projects are incentivized to meet the state of Wisconsin's priority housing needs. DEHCR and WHEDA award points to properties designed to serve the homeless and/or veterans requiring supportive services. Wisconsin's Housing Trust Fund program incentivizes the use of non-federal funding sources by offering points for the portion of the total development budget to be paid by non-federal funding sources. Finally, DEHCR and WHEDA provide points to projects which utilize fewer Housing Trust Funds per unit.

HOME-ARP

During PY 25, HOME-ARP recipients provided a variety of supportive services including rent assistance, rent arrears, rental application fees, utility payments, childcare, legal services, housing counseling services, landlord/tenant liaison services, transportation, case management, substance abuse treatment services, job training and other services. Supportive services helped a total of 98 households with rental assistance, 77 received assistance with rental arrears and 62 received both rental assistance and arrears. Grantees said being able to provide arrears was a game changer for many households because it removed a barrier to household self-sufficiency. Of the households that received HOME-ARP Supportive Services 40% were experiencing homelessness and 32% were at risk of homelessness, 20% were fleeing/attempting to flee domestic violence, and 8% were other households experiencing housing instability.

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CR-10 RACIAL AND ETHNIC COMPOSITION

Racial and Ethnic Status

	CDBG	HOME	ESG	HOPWA	HTF	HOME-ARP
Race:						
White	29,384	1,256	7,878	84	28	438
Black or African American	599	503	6,885	75	3	93
Asian	428	19	200	2	0	4
American Indian or American Native	365	47	618	2	0	18
Native Hawaiian or Other Pacific Islander	3	6	33	0	0	1
Total	30,779	1,831	15,614	163	31	554
Ethnicity:						
Hispanic	1,227	41	762	20	6	51
Not Hispanic	30,610	2,158	17,534	166	25	577

Table 3 – Racial and Ethnic Status

Additional Narrative

CDBG program TOTAL families/persons assisted equals 33,575
1,871 additional families/persons assisted by the CDBG program also include:

Race data
Some Other multi-racial= 1,515
Two or More races= 356

HOME program TOTAL families/persons assisted equals 2,166
335 additional families/persons assisted by the HOME program also include:

Race data
Some Other multi-racial=22
Two or More races=313

ESG program total persons assisted equals 18,549.
The total includes 2,022 persons served by domestic violence service providers.
In addition to the above, persons assisted by the ESG program also include:
Race: 1,969 multi-racial / 18 Middle Eastern or North African / 6 Southeast Asian / 53 Hispanic / 50 Other / 779 Client refused or data not collected.
Ethnicity:

HOPWA program TOTAL families/persons assisted equals 271
85 additional families/persons assisted by the HOPWA program also include:

Race data
Some Other multi-racial
Two or More races

HTF program TOTAL families/persons assisted equals 31

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CR-15 RESOURCES AND INVESTMENTS-91.520 (A)

Resources Made Available

Source of Funds	Source (Federal, state local)	Resources Made Available	Amount Expended During Program Year Program Year 2025
CDBG	public - federal	$59,851,626	$27,582,851
HOME	public - federal	$38,100,086	$12,933,560
ESG	public - federal	$3,571,427	$3,232,899
HOPWA	public - federal	$1,127,169	$1,147,583
HTF	public - federal	$11,014,953	$6,961,164
OTHER	public - federal	$59,361,396	$13,250,847

Table 4 – Resources Made Available

Geographic Distribution and Location of Investments

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. DEHCR's rationale for the priorities for allocating investments geographically is explained by each program.

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. The CDBG Housing program distributes funds to seven housing regions, and then the regional administrator of each housing region distributes dollars throughout 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 ensures, currently through its contract with Vivent Health (formerly known as AIDS Resource Center of Wisconsin), full coverage in the 66 counties in DEHCR's HOPWA area.

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Leveraging

CDBG

CDBG-ED funding is often used as gap financing, allowing it to leverage other sources of funds at the local level. CDBG-Planning and CDBG-Public Facilities for Economic Development (CDBG-PFED) have a 50 percent match requirement. This requirement is often satisfied using funds from local government and other state or federal agencies. Matching funds used on CDBG projects often greatly exceed the minimum match requirements. Substantial Amendment #4 to the 2015-2019 Consolidated Plan made changes to match criteria that became effective in program year 2019. The State updated the match requirement for CDBG-Public Facilities and CDBG-Planning awards to require $1 in match for every $2 awarded; however, waives the match requirement for CDBG-Planning projects for broadband internet expansion.

HOME

HOME funding is used to leverage additional finances to fund affordable housing programs. The 25 percent match requirement for HOME programs is met through a combination of private finance, cash contributions investments from state and local government sources, donated land, materials, service, and labor. DEHCR meets the 25 percent match requirement through grantee agencies providing the match and state programs that provide significant matching funds (Housing Cost Reduction Initiative/Critical Assistance, Wisconsin Department of Health Services, Wisconsin Department of Corrections, DOA, Wisconsin Housing and Economic Development Authority [WHEDA] Home Loan Program, and the WHEDA Foundation). DEHCR continues to work with WHEDA to administer the Low-Income Housing Tax Credits (LIHTC), to coordinate affordable housing resources. WHEDA staff continues to provide input and advice to DEHCR staff on the Rental Housing Development Program (HOME-RHD).

ESG

The ESG program exceeded its match requirement this year, as shown in CR-75. In 2025, $1,515,000 in state homelessness prevention and rapid re-housing funding was awarded to ESG grantees along with federal ESG funding. This funding is used to satisfy a portion of the match requirement, and the rest of the match requirement is met through federal, state, and local government funding, private donations, and donated materials, services, and labor.

HTF

During the PY 25 awards cycle, twelve awarded HTF projects leveraged an additional $166 million for projects committed during the CAPER reporting period.

Fiscal Year Summary HOME Match

Fiscal Year Summary - HOME Match	
1. Excess match from prior Federal fiscal year	$100,006,567
2. Match contributed during current Federal fiscal year	$5,765,005
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	$105,771,572
4. Match liability for current Federal fiscal year	$3,393,434
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	$102,378,138

Table 5 – Fiscal Year Summary HOME Match

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Match Contribution for the Federal Fiscal Year

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution (mm/dd/yyyy)	Cash (non-federal sources)	Foregone Taxes, Fees, Charges	Appraised Land /Real Property	Required Infrastructure	Site Prep, Construction Materials, Donated Labor	Bond Financing	Total Match
HHR 21.17 CHDO	3/24/2026	$23,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$23,000.00
HHR 21.18 CHDO	3/24/2026	$23,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$23,000.00
HHR 23.02	4/17/2025	$83,987	$0.00	$0.00	$0.00	$0.00	$0.00	$83,987
HHR 24.06	12/2/2025	$28,318	$0.00	$0.00	$0.00	$0.00	$0.00	$28,318.00
HHR 24.10	3/24/2026	$109,000	$0.00	$0.00	$0.00	$0.00	$0.00	$109,000.00
HHR 24.13	3/24/2026	$154,800	$0.00	$0.00	$0.00	$0.00	$0.00	$154,800.00
HHR 25.02	3/17/2026	$5,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$5,000.00
HHR 25.13	3/17/2026	$35,000	$0.00	$0.00	$0.00	$0.00	$0.00	$35,000.00
TBRA 23.01	4/1/2025	$10,767	$0.00	$0.00	$0.00	$0.00	$0.00	$10,767
TBRA 24.01	10/1/2025	$47,294	$0.00	$0.00	$0.00	$0.00	$0.00	$47,294
TBRA 24.02	12/1/2025	$64,655	$0.00	$0.00	$0.00	$0.00	$0.00	$64,655.00
TBRA 25.02	3/1/2026	$25,776	$0.00	$0.00	$0.00	$0.00	$0.00	$25,776.00
TBRA 23.04	6/1/2025	$41	$0.00	$0.00	$0.00	$0.00	$0.00	$41
TBRA 24.04	3/1/2026	$33,547	$0.00	$0.00	$0.00	$0.00	$0.00	$33,547
TBRA 24.07	1/1/2026	$8,876	$0.00	$0.00	$0.00	$0.00	$0.00	$8,876
TBRA 25.08	3/1/2026	$2,924	$0.00	$0.00	$0.00	$0.00	$0.00	$2,924
TBRA 24.10	3/1/2026	$15,452	$0.00	$0.00	$0.00	$0.00	$0.00	$15,452
TBRA 24.11	3/1/2026	$15,187	$0.00	$0.00	$0.00	$0.00	$0.00	$15,187
TBRA 25.15	3/1/2026	$2,731	$0.00	$0.00	$0.00	$0.00	$0.00	$2,731
RHD-2501	12/30/2025	$360,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$360,000.00
RHD-2403	6/24/2025	$600,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$600,000.00
RHD-2406	6/27/2025	$600,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$600,000.00
RHD-2402	12/29/2025	$0.00	$0.00	$216,263.00	$0.00	$0.00	$0.00	$216,263.00

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RHD-2405	10/28/2025	$500,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$500,000.00
RHDC-2303	6/23/2025	$360,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$360,000.00
RHD-2410	12/29/2025	$0.00	$252,637	$0.00	$0.00	$0.00	$0.00	$252,637
RHD-2404	6/27/2025	$0.00	$0.00	$570,000.00	$0.00	$0.00	$0.00	$570,000.00
RHD-2407	12/29/2025	$0.00	$0.00	$0.00	$0.00	$0.00	$376,750.00	$376,750.00
RHD-2408	9/24/2025	$0.00	$0.00	$340,000.00	$0.00	$0.00	$0.00	$340,000.00
RHD-2409	6/30/2025	$900,000.00	$0.00	$0.00	$0.00	$0.00	$0.00	$900,000.00

Table 6 – Match Contribution for the Federal Fiscal Year

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HOME Program Income

Program Income – Enter the program income amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
$9,787,972	$3,563,012	$5,338,327	$0	$8,012,657

Table 7 – HOME Program Income

Minority Business and Women Business Enterprises (MBE-WBE)

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	White Non-Hispanic
Contracts: Number	407	2	0	6	12	387
Dollar Amount	$136,919,675	$328,404	0	$321,500	$468,743	$135,801,028
Sub-Contracts: Number	580*	3	0	2	34	518
Dollar Amount	$119,716,382	$36,621	$0	$74,482	$8,393,900	$104,603,227
	Total	Women Business Enterprises	Male			
Contracts: Number	407	30	377			
Dollar amount	$136,919,675	$42,510,382	$94,409,293			
Sub-Contracts: Number	557	72	485			
Dollar Amount	$113,108,230	$14,966,907	$98,141,323			

Table 8 – Minority Business and Women Business Enterprises (MBE-WBE)

*Includes uncategorized HTF MBE and WBE sub-contracts entered into by WHEDA

Minority Owners of Business Property

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	**0**	**0**	**0**	**0**	**0**	**0**
Dollar Amount	**$0.00**	**$0.00**	**$0.00**	**$0.00**	**$0.00**	**$0.00**

Table 9 – Minority Owners of Business Property

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Relocation and Property Acquisition

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
	Number	Cost				
Parcels Acquired	0	$0				
Businesses Displaced	0	$0				
Nonprofit Organizations Displaced	0	$0				
Households Temporarily Relocated, not Displaced	0	0				
Households Displaced	**Total**	Minority Business Enterprises				
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	**White Non-Hispanic**
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Property Acquisition

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CR-20 AFFORDABLE HOUSING-91.520 (B)

Affordable Housing – Number of Households Assisted

	One-Year Goal	Actual
Number of homeless to be provided affordable housing units	671	564
Number of non-homeless to be provided affordable housing units	1,412*	607*
Number of special-needs to be provided affordable housing units	1,725	1,902
Total	3,808	3,073

Table 11 – Number of Households Assisted

*Includes HTF-funded ELI housing units

Affordable Housing – Number of Households Supported

Number of households supported through:	One-Year Goal	Actual
Rental Assistance	2,395	781
The Production of New Units	88*	345
Rehab of Existing Units	914	409
Acquisition of Existing Units	410	57
Total	3,807	1,592

Table 12 – Number of Households Supported

*Includes HTF-funded ELI housing units

Discuss the difference between goals and outcomes and problems encountered in meeting these goals

CDBG

The CDBG-H program did not meet the planned number of units assisted for homebuyer and rental rehabilitation. The CDBG-H program has experienced a shortage of contractors to work in the program; this is especially true of trade contractors including plumbers and electricians. In addition, the housing program has seen a rise in the number of projects exceeding $50,000 to make the property decent, safe and sanitary.

HOME

The average amount of HOME-HHR assistance provided to homebuyers in Program Year 2025 was higher than planned by approximately 9 percent ($24,074 planned versus $26,241 actual) which is outside the variance rate for the program. Higher assistance amounts were needed to meet affordability goals. To make more homes affordable to Low-Moderate Income (LMI) families, a greater supply of available housing was required.

The average amount of assistance provided to homeowners for rehabilitation in Program Year 2025 was higher than planned ($47,360 planned versus $55,648 actual) which is outside the variance rate for the program. The higher cost can be attributed to scope of work that needs to be done coupled with local market conditions. Again, a lack of available houses to rehabilitate was experienced in Wisconsin. Total average per unit increased to $30,679.

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HOME-TBRA provided rental assistance to 488 households which were homeless or at risk of homelessness. The TBRA program provides security deposit, rent, and utility assistance to individuals and households who have an income of 60 percent or less of the county median income and who were experiencing homelessness or at risk of homelessness. Individuals and households with incomes up to 80 percent of CMI may be eligible for the TBRA program with prior DEHCR approval.

The state also continued a service approach which required grantees to cover more than one county. All grantees renewed their contracts in PY 25 as there are significant shortfalls in available housing in rural areas. Unfortunately, the competitive housing market and the lack of available, affordable housing units were major factors in rent increases and the difficulty for placing households during PY 25. Housing costs went up for all rental products ranging from 2.9% to 19.6% over 2024 pricing. Lack of safe, sanitary, and affordable rental inventory throughout the entire state of Wisconsin prevented the State from meeting its goals for households served.

The HOME-RHD program met the goal for construction and/or rehabilitation of affordable rental units.

HTF

The HTF program set a goal of completing one application cycle during PY 25 which was held in December 2025. However, DEHCR and WHEDA offered a total of two opportunities for applicants to request Housing Trust Funds in 2025. DEHCR conducted a competitive round of applications for the allocation of HTF in concurrence with the LIHTC application cycle, in December 2025. also conducted a competitive application cycle for any projects serving extremely low-income residences in the spring of 2025.

During 2025, construction was completed on 132 HTF units and is in process on an additional 462 total units. Projects funded in PY 25 leveraged approximately $166 million in non-federal funding sources. In addition, 42 units are committed to be designated for persons experiencing homelessness or veterans. Lastly, the average award per unit created was within the projected cost per unit.

Nine projects were completed in a high needs census tract during PY 25. Two awards were made in rural areas without a recent tax credit award; however, eight awards were for a workforce housing community. The Housing Tax Credit program has worked to emphasize more rural development projects being completed, and both DEHCR and WHEDA are excited to report that these efforts were successful in PY 25. WHEDA and DEHCR are contemplating a separate targeted funding cycle for projects located in rural areas without a recent tax credit award and workforce housing communities to further strengthen support for these identified needs.

HOME-ARP

HOME-ARP funds are likely to be fully awarded ahead of the deadline. To date, 15 units have been built and 10 more will be completed this summer. DEHCR anticipates awarding funds for 49 more units. In total, units built, in construction and projects under final approval equal 74. Four additional projects are under preliminary review totaling 37 units. Increases in building costs have impacted the average price per unit.

Discuss how these outcomes will impact future Annual Action Plans

CDBG

Grantees continue to reach out to the contractor base in their service area and recruit contractors for the CDBG-H program. The CDBG-H program continues to make funds available to assist contractors in

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becoming trained in lead-safe work practices, lead abatement, and lead risk assessment. DEHCR is building on efforts to encourage collaboration between CDBG-H and home weatherization providers to maximize available resources.

HOME

DEHCR can work to develop more contractors and affordable housing. For example, funding could be used to provide more lead paint training to assist contractors in becoming certified in lead abatement procedures, risk assessment, and lead safe work practices. DEHCR can also work with grantees to develop more housing units in areas where demand for housing is higher. Aging homes throughout the areas of Wisconsin that DEHCR serves will continue to drive up the need for and the cost of rehabilitation.

In the 2020-2024 Consolidated Plan, the HOME TBRA program's client eligibility was expanded to enable grantees to provide rental assistance to individuals and families who are experiencing homelessness or at risk of homelessness without the requirement of a disabled family member. As a result, all HOME TBRA participants are homeless or at risk of homelessness.

HOME-TBRA grantees are required to affirmatively market their HOME-TBRA programs to all members of their target populations, which necessarily include people who are homeless or at risk of homelessness. They are also required to identify those target populations least likely to apply for HOME-TBRA and determine what special outreach activities will ensure they are fully informed about HOME-TBRA. Substantial Amendment #4 to the 2015-2019 Consolidated Plan made changes to eligibility criteria that become effective in program year 2019. Unfortunately, the competitive housing market and the COVID-19 pandemic were major factors in rent increases and the shortage of affordable units available for rent during PY 25. Lack of safe, sanitary, and affordable rental inventory throughout the entire state of Wisconsin prevented the State from meeting its goals for households served.

HTF

DEHCR and WHEDA will continue to align prioritization of project selection criteria with the goals and outcomes.

HOME-ARP

DEHCR will continue working with applicants to strengthen their proposals so they pass HOME-ARP award thresholds. Once a project meets threshold requirements they are recommended for a preliminary award. DEHCR then continues working with preliminary awardees, to ensure the projects will meet the requirements for final awards by the deadlines.

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Number of Persons Served

Number of Persons Served	CDBG Actual	Home Actual	HTF Actual
Extremely Low-income	37	648	132
Low-income	47	1,489	
Moderate-income	89	76	
Total	**173**	**2,213**	

Table 13 – Number of Persons Served

Additional Narrative

All HOME-TBRA data comes from HMIS.

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CR-25 HOMELESS AND OTHER SPECIAL NEEDS-91.22(D,E) ET AL

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

HOME

The Division of Energy, Housing and Community Resources (DEHCR) encourages its HOME TBRA grantees to adopt a 'Housing First' philosophy for their programs. According to the National Alliance to End Homelessness, "Housing First is a homeless assistance approach that prioritizes providing people experiencing homelessness with permanent housing as quickly as possible – and then providing supportive services as needed." This approach was created to end homelessness by prioritizing a client's choice in both housing selection and in-service participation.

By Substantial Amendment, the HOME TBRA program's client eligibility was expanded to allow grantees to provide rent assistance to households who are experiencing homelessness or at risk of homelessness without the requirement of a disabled family member. This permitted the HOME TBRA program to expand their eligibility to clients who are homeless or at risk of homelessness.

TBRA grantees are not required to utilize Coordinated Entry to dictate who can be enrolled in their TBRA programs, but to utilize it as a tool to determine client eligibility. Coordinated Entry assesses individual needs and directs people to the program that is best equipped to meet their needs. Those who have the most acute needs, such as unsheltered persons or persons with serious mental illness, are directed towards programs such as permanent supportive housing that are better equipped to work with clients with the highest needs. Since HOME regulations do not require supportive services be provided in conjunction with rent assistance, the TBRA program may not be the most suitable option for persons with the highest needs.

However, all HOME TBRA grantees must continue to market their TBRA programs to all eligible clients of their target populations. Grantees are also required to identify those target populations least likely to apply for the program and determine what special outreach activities are needed to ensure that their target populations are fully informed about the HOME TBRA program.

ESG

Coordinated entry is fully implemented by all four Wisconsin HUD Continua of Care to ensure that resources are targeted towards those who need them most. Coordinated entry assesses individual needs and directs people to the program that is best equipped to meet their needs. Those who have the most acute needs, such as unsheltered persons or persons with serious mental illness, are directed towards programs such as permanent supportive housing that are best equipped to work with clients with high needs. ESG recipients are required to participate in the implementation and use of coordinated entry.

Street outreach to unsheltered persons is necessary to engage them and work towards housing stability. 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.

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HOPWA

The HOPWA program collaborates with local homeless coalitions throughout the state's service area as well as local public health and infectious disease departments to support individuals who are homeless and have either a new diagnosis or who are new to the state and living with HIV/AIDS. Once a referral is made to Vivent Health, Inc., both the TBRA and PHP programs provide opportunities for the HOPWA program to help move people from homelessness into affordable housing.

HOME-ARP

HOME-ARP grantees are required to provide outreach services to eligible communities. Once households have been screened for HOME-ARP eligibility, if the HOME-ARP program cannot help them due to the household being ineligible or the program not having enough space, the household is connected to other programming and added to the Coordinated Entry (CE) list as appropriate.

HOME-ARP Supportive Services and RHD QP units are accessed through Expanded Coordinated Entry (ECE) run through a partnership with WIBOS and ICA, as well as the agencies awarded for HOME-ARP Supportive Services, and through the Property Management Teams at the HOME-ARP RHD Projects. Potential clients are screened to determine whether they fit a QP definition (QP1: homeless; QP2: at risk of homelessness; QP3: fleeing/attempting to flee domestic violence; QP4: other populations at risk of housing instability) and if they do, they are added to the ECE list. Clients are then taken from the ECE list in chronological order, unless a specific project (Supportive Service or RHD) has a preference for a specific QP in which case those households are given priority.

Addressing the emergency shelter and transitional housing needs of homeless persons

HOME

Across 18 programs, the HOME TBRA program provided 488 households with up to 24 months of housing assistance in the form of rent, security deposits, and utility assistance across 61 Wisconsin counties. Target populations of the HOME TBRA program are persons experiencing homelessness, at risk of homelessness and other special needs as designated by the local continuum of care (COC) and submitted grant application. As a result, most HOME TBRA clients are classified as homeless or at risk of homelessness.

With the Substantial Amendment #4 made to the 2015-2019 Consolidated Plan, HOME TBRA program eligibility was expanded to enable grantees to provide rental assistance to homeless individuals/families without the requirement that they have a disabled family member. The HOME TBRA program can only subsidize units that meet HUD's Fair Market Rent (FMR) and rent reasonableness guidelines; therefore, HOME TBRA grantees can assist clients in locating and selecting units that meet those affordable housing guidelines. Supportive services are not an eligible activity that TBRA funding can be utilized for. Unless TBRA grantees have partnerships with external agencies to provide those services, clients may not be connected to mainstream resources that would help them become self-sufficient in a timely manner. The longer a client is enrolled in the TBRA program, the less resources available to serve more households in need.

ESG

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. As such, it is important that emergency shelters have the ability to connect those experiencing homelessness

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with the resources needed to exit homelessness, using the lightest touch possible. Approximately 74 percent of 2025 ESG funding was used for emergency shelter and rapid re-housing programs. In 2025, for the tenth time, DEHCR required ESG applicants to assess homeless system performance and use performance data when distributing funding at the local level. In many cases, applicants assessed shelter data to meet this requirement, and allocated more funding to shelters who are serving higher numbers of clients, moving clients into permanent housing quickly, and best ensuring that clients do not return to homelessness.

HOME-ARP

HOME-ARP can provide a variety of services to people in shelter, moving out of shelter, and in danger of losing their housing. These supportive services include case management, job training, life skills training, housing counseling, credit counseling, transportation, food, mental health services, substance abuse treatment services, and financial assistance to help people move into housing by removing barriers through rental assistance, arrears, utility payments, and moving costs.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

HOME

Across 18 programs, the HOME TBRA program provided 488 households with up to 24 months of housing assistance in the form of rent, security deposits, and utility assistance across HOME non-entitlement areas throughout Wisconsin. Target populations of the HOME TBRA program are persons experiencing homelessness, at risk of homelessness, and other special groups as designated by the local continuum of care (COC) and submitted through grant applications. With the Substantial Amendment #4 made to the 2015-2019 Consolidated Plan, HOME TBRA program eligibility was expanded to enable grantees to provide rental assistance to homeless individuals/families without the requirement that they have a disabled family member.

ESG

Through its involvement with the Interagency Council on Homelessness, which was formally codified in state statute in 2017, DEHCR works with the four Wisconsin CoCs and other state agencies which house publicly funded systems that can discharge persons into housing instability and homelessness. Collaboration with this Council allows these agencies to work together towards discharge planning solutions. In 2022, the Council published a statewide Plan entitled “Welcoming Wisconsin Home: A Statewide Action Plan for Homelessness 2021-2023”. Currently, the Council is working on implementing the Plan. In addition, collaboration with this Council has led to interagency efforts to end homelessness. DEHCR has collaborated with the Wisconsin Department of Children and Families to fund a program targeted at youth who have aged out of the foster care system and are experiencing homelessness or at risk of homelessness. Interagency Council members regularly exchange information relative to programmatic requirements, eligibility for funding and distribute this information to reduce organizational “silos” and create synergies.

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HOPWA

The HOPWA program provided short-term rental, mortgage, utility, TBRA, and supportive services assistance was provided to 138 households with HOPWA funding.

HTF

The Wisconsin Housing and Economic Development Authority has primarily required that Housing Trust Funds are paired with Housing Tax Credits since the inception of the program in the state. Through this pairing, WHEDA has been able to ensure that trust funds are deployed to projects that include units restricted to extremely low-income individuals and families (families earning no more than 30% of County Median Income).

The Housing Trust Fund incentivizes the creation of permanent housing for individuals impacted by homelessness by providing competitive scoring points in the application process for projects that include this type of housing. The definition of residents eligible for these units includes individuals currently experiencing homelessness or are at risk of becoming homeless, including youth aging out of the foster care system. Projects providing units targeted to this population must also make available accompanying services to support these individuals. While it is a program requirement, HTF awards cannot directly be used to pay for the cost-of-service provision.

HOME-ARP

Qualifying Population (QP) Four (Other Populations) encompasses people who were previously homeless, received limited assistance to become housed and are in need of additional housing to avoid becoming homeless. Households can also qualify by being severely cost burdened with an AMI below 30% or AMI below 50% and meeting 2 characteristics of housing instability (including exiting a publicly funded institution or system of care). 51 QP 4 households were assisted last year (8% of all households assisted).

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

HOME

Rental subsidy programs can be an essential mechanism to help house persons who are homeless or at-risk of homelessness. The TBRA program provides rental assistance, security deposit assistance, and/or utility assistance (if applicable) to low- and very low-income households. Among the 18 grantees, the Wisconsin HOME TBRA program provided 488 households with up to 24 months of assistance across the 61-Wisconsin county service area (excluding HOME entitlement areas). The HOME TBRA program can only subsidize units that meet the payment standard and rent reasonableness guidelines; therefore, HOME TBRA grantees assist beneficiaries in locating and selecting units that meet these affordable housing guidelines. HOME TBRA funds can serve individuals and households who are experiencing homelessness or are at risk of homelessness.

ESG

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The ESG program allows for funding of rapid rehousing programs. Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing. This has the potential to decrease the length of time participants spend homeless, taking strain off of the shelter system. The funding formula which distributes ESG funding takes "exits to permanent housing" and "returns to homelessness" into account.

Homeless prevention programs are also funded by ESG and other state funds. These funds allow agencies to keep individuals and families from becoming homeless in the first place. This allows families to avoid potential trauma, upheaval, and an eviction on their record. To promote efficient use of funds, DEHCR requires targeting prevention funds towards those with the greatest need through the use of coordinated entry.

HTF

The Housing Trust Fund incentivizes the creation of permanent housing for individuals experiencing homelessness by providing competitive scoring points for projects that assist persons and families experiencing homelessness. The definition of residents eligible for these units includes individuals currently experiencing homelessness or who are prone to or at imminent risk of becoming homeless. Projects providing units targeted to this population must also make available accompanying services to support these individuals. While it is a program requirement, HTF awards cannot directly be used to pay for the cost-of-service provision.

HOPWA

The HOPWA program addresses the full spectrum of housing needs for low-income persons living with HIV/AIDS through Permanent Housing Placement (PHP), Tenant-Based Rental Assistance (TBRA), Short-Term Rent, Mortgage, and Utility (STRMU) assistance, and supportive services such as case management. PHP shortens the period of homelessness by removing upfront financial barriers to securing permanent housing. TBRA promotes long-term housing stability by providing a portable rental subsidy that allows households to access and maintain affordable housing in the private market. STRMU prevents homelessness by helping households remain in their homes during temporary financial or health-related crisis. Case management ties these interventions together by helping households identify appropriate solutions, develop individual housing stability plans, connect to services and benefits, and work toward greater self-sufficiency and independence. Together, these activities create a coordinated pathway that moves households from homelessness and housing instability towards permanent, stable housing.

HOME-ARP

HOME-ARP Supportive Services assists with financial assistance (rental assistance, arrears, moving, storage) to help remove barriers to help people move into housing and then support them in housing through ongoing rental and utility assistance, and supportive services (case management, training, food, child care, transportation, etc.) to help them stabilize and enhance self-sufficiency. HOME-ARP targets people who meet the definition of one of qualifying populations (QPs; homeless, at-risk of homelessness, fleeing domestic violence+, and other populations facing housing instability). QP4 other populations facing housing instability has one part of the definition that directly focuses on helping households that were previously homeless, and received limited-time assistance to become housed and now need additional assistance or supportive services to avoid becoming homeless again.

Each HOME-ARP RHD Project reserves 70% or more of the assisted units for QP households and offers connection to local supportive services to enhance the opportunity for a household's long-term success.

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CR-30 PUBLIC HOUSING-91.220 (H); 91.320 (J)

Actions taken to address the needs of public housing.

In Wisconsin, community and county Public Housing Authorities (PHAs) own and manage the public housing developments located throughout the state. The PHAs receive funding directly from HUD.

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

The Division of Energy, Housing and Community Resources does not own, operate or manage any public housing units, and as a result, the State is not directly involved in public housing improvement, or in the development or delivery of programs and services for public housing residents.

Actions taken to provide assistance to troubled PHAs.

The State reviews the PHA's annual plans in developing its Consolidated Plan and reviews PHA plans for consistency with the State's Consolidated Plan.

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CR-35 OTHER ACTIONS-91.220(J-K); 91.320(I-J)

Actions taken 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 included and submitted its Analysis of Impediments (AI) with its 2025-2029 Consolidated Plan. Wisconsin has been making progress towards eliminating the impediments identified in its AI and intends to continue to utilize applicable federal funding towards the furtherance of its goals. The Wisconsin "home rule" provision means 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 reduce 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 respects this constitutional policy of local control, and therefore 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 do 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.
- WHEDA's LIHTC program offers a reduction in tax liability to property owners and private investors to encourage the development of affordable rental housing.
- The State of Wisconsin will utilize Housing Trust funds to ameliorate barriers to affordable housing and develop affordable rental housing.

DEHCR will continue to work with grantees to minimize the impact of these fees and other restrictions.

Actions taken to address obstacles to meeting underserved needs

CDBG

The primary obstacle to meeting underserved needs in Wisconsin is a lack of adequate funding. DEHCR will continue efforts to ensure maximum state coverage with program resources. Emphasis will also be placed on enhancing local capacity building and disadvantaged and under-served areas.

DEHCR will continually evaluate its administration of CDBG funds in order to meet Wisconsin's affordable housing and community and economic development needs. 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 both allowed under the federal guidelines and best address the needs of the local community.

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

- Collaborate with WHEDA, HUD, USDA Rural Development, and the State of Wisconsin Department of Administration, Division of Intergovernmental Relations to:
    - Address special housing and community and economic development opportunities.
    - Sponsor training and technical assistance for local officials. This will 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 needs in programs with unmet critical needs.
- DEHCR is building on efforts to encourage collaboration between CDBG-H and home weatherization providers to maximize available resources.

The CDBG-H program continues to serve 69 counties in the state of Wisconsin. The remaining 3 counties receive direct assistance from HUD. This approach ensures all LMI households have access to housing resources.

HOME

DEHCR will continue efforts to ensure maximum state coverage with program resources. Currently, the HOME-HHR program serves 65 counties through Wisconsin that do not receive HOME funds directly. The program will also continue to review grantee allocations to best serve the 65 counties. DEHCR continues to collaborate with WHEDA, HUD, USDA Rural Development, and the State of Wisconsin Department of Administration, Division of Intergovernmental Relations to address special housing needs throughout the state.

The HOME TBRA program serves counties throughout Wisconsin that do not receive HOME funds directly. Currently, the HOME TBRA program serves 61 out of 65 eligible counties (Wisconsin has a total of 72 counties; seven counties are HOME entitlement areas). The HOME TBRA program will continue to review funding allocations to best serve grantees' service areas while encouraging new organizations to include underserved counties.

ESG

The primary obstacle to meeting the underserved needs of people experiencing homelessness is lack of adequate funding. The Emergency Solutions Grant/Homelessness Prevention Program/Housing Assistance Program (EHH), which includes a mix of federal and state funding, is working to increase the impact of scarce funding by emphasizing performance in the application process and rewarding the highest performing grantees with additional funding. Efforts taken in other programs to increase the supply of affordable housing will also help to meet the needs of persons experiencing homelessness.

HTF

The Housing Trust Fund program provides assistance to projects that incorporate 30% CMI units – set aside for very low-income individuals.

HOPWA

An obstacle to meeting underserved needs for low-income households who were approved for HOPWA-TBRA is that TBRA vouchers are not recognized as proof of income. This makes it difficult for low-income

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households to afford safe and stable housing. This is particularly true for families, who require more space and therefore have higher rent. The HOPWA program has addressed this by incorporating Landlord Outreach Specialists to work in collaboration with Case Managers to build stronger relationships and trust with landlords.

HOME-ARP

As part of HOME-ARP Supportive Service and RHD applications, the applicant can choose to have a preference for Qualifying Populations (QP) 1-3. They are not required to have a preference, however. This enables the applicant to use their local knowledge to enhance the targeting of the local HOME-ARP programming to address unmet needs. If a preference is selected all of the preference QP households are served first, and then the households from the other QPs are served in chronological order.

Actions taken to reduce lead-based paint hazards

The CDBG-H and HOME programs require all pre-1978 homes be rehabilitated in a lead-safe manner. 93 CDBG-H housing units (owner occupied =93, rental units = 0) and 163 HOME-HHR units were rehabilitated using lead-safe work practices (see IDIS HOME lead-based paint report) during the 2025 program year.

The programs will continue to ensure all rehabilitation on pre-1978 homes is done in a lead-safe manner, including abatement, interim controls or standard practices, lead safe work practices, visual assessment/paint stabilization or other actions required by federal regulation. All projects that utilize lead-safe work practices receive a lead clearance to ensure the property is safe from lead hazards. All units subsidized by HOME-TBRA funding must pass a NSPIRE inspection before a household moves in to the unit. CDBG-H requires that units built before 1978 have little to no peeling paint on most interior and exterior surfaces regardless of the age of the housing occupants. Additionally, the ESG and HOPWA programs require grantees to comply with all applicable lead-based paint remediation and disclosure laws.

Funding for lead training is made available to assist contractors in becoming trained in lead-safe renovator and lead abatement.

HTF environmental requirements specify that all projects must be free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances. Especially where a hazard could affect the health and safety of occupants or conflict with the intended use of the property. For multifamily properties (4 or more units) – a Phase I ESA–ASTM is required. If the Phase I ESA identifies RECs, a Phase II ESA–ASTM will be required. If the Phase II indicates the presence of hazardous substances or petroleum products above applicable local, state, tribal or federal (LSTF) screening levels, coordination with the relevant LSTF oversight agency will be required to complete the remediation process and obtain a determination that no further action is required.

All units receiving HOME-ARP rental/security deposit assistance (Supportive Services program) must pass a Habitability Inspection plus a Lead-Based Paint Inspection. If the structure was built prior to 1978, and a child of under the age of six or a pregnant woman will reside in the property, disclosure documentation on the potential presence of lead-based paint and a pamphlet on lead poisoning prevention must be provided to the household. In addition, a visual inspection of the property must be completed and if the property has a defective paint surface inside or outside, the property cannot be approved until the surface is repaired. If a child under the age of six has an elevated blood level, and the

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property been assisted with HOME-ARP grantees should alert the County Health Services and DOA. All HOME-ARP RHD projects to date have been 100% new construction.

Actions taken to reduce the number of poverty-level families

A number of grantees require their recipient households, as a condition of assistance, to become as self-sufficient as possible. DEHCR encourages the development of self-sufficiency components within an applicant's program design. Through these efforts, DEHCR seeks not only to stabilize households in crisis, but also to reduce households' dependence on public assistance and to begin developing pathways out of poverty.

CDBG

DEHCR and the Wisconsin Economic Development Corporation (WEDC) will continue collaborative efforts with WHEDA and USDA-Rural Development to help local communities, particularly in rural areas, be aware of programs available to them and ways to leverage dollars to maximize both the impact of program dollars and the quality of housing and community development.

In the CDBG-PFED and CDBG-ED 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 costs 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.

HOME

HOME-HHR grantees are encouraged to hire Section 3 employees and train others in the construction industry that are considered Section 3. HOME TBRA grantees must serve persons who have a household income at or below 60% of the county median income and who are experiencing homelessness or who are at risk of homelessness. HOME TBRA grantees are also encouraged to partner with local organizations to provide supportive services to TBRA clients, giving them an opportunity to become self-sufficient.

ESG

In the ESG program, a number of grantees work with their clients to ensure that they become as self-sufficient as possible through case management and referral to mainstream resources.

HTF

The Housing Trust Fund program provides assistance to projects that incorporate 30% CMI units – set aside for very low-income individuals.

HOPWA

The HOPWA program provides case management to all clients to help them become as self-sufficient as possible. If it is appropriate to the client's health situation, one of the supportive services provided will be employment assistance and training.

HOME-ARP

HOME-ARP RHD grantees are encouraged to hire Section 3 employees and train others in the construction industry that are considered Section 3. HOME-ARP Supportive Services grantees help households become self-sufficient by removing barrier to moving into housing or staying in housing (example: paying down arrears to allow a household to move into a unit, helping with a security deposit,

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and assisting with monthly rent payments) and enhancing their ability to be self-sufficient through case management, legal support, training, credit counseling, and more.

Actions taken 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 occurred in Program Year 2020 allowed DEHCR to focus needed resources on housing and public facility projects without adversely affecting DEHCR's ability to support appropriate economic development projects.

DEHCR supports collaborative efforts among local agencies and is working with partner agencies to identify opportunities for weatherization and housing to work together. DEHCR has hosted regional collaboration meetings to encourage agencies to work together and to identify and remove barriers. DEHCR believes this approach will lead to improved efficiencies for both programs and the clients we serve.

HOME

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. Collaborative efforts among local agencies are strongly encouraged. Training and technical assistance continue to improve the delivery of housing and homeless assistance. The HOME-HHR program continues to work with approximately 16 non-profit organizations to develop a statewide network. DEHCR also works with partner agencies to identify opportunities for weatherization and housing to work together. DEHCR believes this approach will lead to improved efficiencies for both programs and the clients we serve.

ESG

DEHCR continuously works to update the ESG program manual on a regular basis and provides training and technical assistance to grantees statewide. DEHCR encourages grantees to strengthen Continua of Care systems and collaborate with housing providers and mainstream resources.

HTF

Training additional staff members and technical assistance provided from WHEDA's legal department to ensure program regulation compliance from developers continues to improve the efficient delivery of Housing Trust Funds. DEHCR is working with WHEDA to transition monitoring and compliance requirements.

HTF monitoring processes are continually being updated and WHEDA is conducting additional training to staff members across the organization. Staff throughout WHEDA are being asked to help ensure all program requirements are being met and help improve the allocation of funds. WHEDA's legal department has been involved with ensuring certain contingencies and language is included in internal loan committee approval of the deployment of funds and project commitment letter. DEHCR will continue to provide additional technical assistance to WHEDA to assist in compliance and is working with WHEDA to transition monitoring and compliance requirements.

HOME-ARP

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DEHCR requires Supportive Service providers to be identified with each HOME-ARP RHD application, and Property Managers are required to provide information on Supportive Services available to tenants and offer referrals as needed to the Supportive Service provider for all households living in HOME-ARP assisted units.

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

In addition to the connection with WHEDA, DEHCR works in collaboration with many state agencies and partners as well as participates in coalitions of public and private sector housing organizations including:

1. Wisconsin Collaborative for Affordable Housing
2. Wisconsin Fair Housing Network
3. Childhood Lead Poisoning Committee
4. Wisconsin Fresh Start Projects
5. Interagency Council on Homelessness
6. Council of State Community Development Agencies (COSCDA)
7. Balance of State Continuum of Care
8. Racine Continuum of Care
9. Milwaukee Continuum of Care
10. Madison/Dane Continuum of Care

Identify actions taken to overcome the effects of any impediments identified in the jurisdiction's analysis of impediments to fair housing choice

Units of General Local Governments who receive CDBG funding in the CDBG-PF, CDBG-PLNG, CDBG-PFED, and CDBG-ED programs are required to complete three actions to affirmatively further fair housing. DEHCR verifies these actions are completed through its program monitoring.

IMPEDIMENT #1: LACK OF STATE LAWS EQUIVALENCE TO FEDERAL LAW.

Because the state's Open Housing Law did not include the provision of legal representation for the complainant or respondent in discrimination cases that proceed to administrative hearings or court, HUD has not certified Wisconsin as a "substantially equivalent" jurisdiction. This could result in less reporting of fair housing violations to the state as well as a potential loss of federal funds for administration, enforcement, education and outreach available to substantially equivalent jurisdictions.

ACTION TO ADDRESS IMPEDIMENT #1: LACK OF STATE LAWS EQUIVALENCE TO FEDERAL LAW.

Wisconsin Open Housing Law revisions made as part of the 2005-2007 Biennial Budget makes Wisconsin law equivalent to federal law. The revised Open Housing Law requires representation for the complainant by the Attorney General in cases where both the Department of Workforce Development and the Attorney General find probable cause. Representation by the Attorney General is provided for administrative and civil hearings, where the complainant elects to do so. In addition, at the request of the Department of Workforce Development the Attorney General will file a petition for a temporary injunction. Following the law changes, Wisconsin applied to HUD for substantial equivalency but it was not approved.

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CDBG grantees are required to adopt a Fair Housing ordinance and to affirmatively further their Fair Housing ordinance by doing a minimum of three Fair Housing activities during the contractual period. Activities completed range from mailing informational letters to local realtors and lenders, doing local radio talks that cover Fair Housing principles, and writing articles to local newspapers that educate citizens about Fair Housing requirements, etc.

In addition, CDBG-Housing staff educated all of its potential and current grantees on Fair Housing laws and requirements during Application Training and Implementation Training.

IMPEDIMENT #2: LOCAL LAND-USE REGULATIONS.

Wisconsin's tradition of "home rule", embodied in the state constitution, means municipalities control most zoning and land use decisions (the siting of community residential facilities and environmental regulations are exceptions). The concern is that "home rule" allows communities to use ordinances to keep affordable and multifamily housing—frequently the routes by which lower-income, often minority, households enter a community—from being developed. In addition, the use of impact fees for new development raises the cost of new housing and increases the value of existing housing, thus generally reducing affordability. In short, zoning and impact fees can have the effect of "disparate impact". Policies that appear neutral on their face may actually increase segregation.

ACTION TO ADDRESS IMPEDIMENT #2: LOCAL LAND-USE REGULATIONS.

The success of state HOME recipients in promoting their program locally and providing affordable housing opportunities to all racial and ethnic groups is evidenced by the reporting identified under CR-10. Per the report, non-white households account for 17.6 percent of the HOME rental projects, homebuyer projects, and homeowner rehab projects. These percentages compare favorably with the 2016 American Community Survey estimate of a 7.2 percent ethnic and minority population for the Wisconsin Balance of State (the category that closely aligns with the state's jurisdiction). In addition, non-white households account for 41 percent of the HOME-TBRA program recipients.

The HOME-RHD program continues to fund projects with three, four, or occasionally more bedrooms throughout the Balance of State area. HOME-RHD partners with WHEDA LIHTC on many of these projects.

The scoring system for the WHEDA LIHTC program applications includes preference points for developing large family units (3-bedroom or larger) intended for occupancy by residents with special needs, and units with accessible design.

IMPEDIMENT #3: LOCAL DISCRIMINATION IN CONSUMER LENDING.

The administrative code (DFI-Bkg 80.85) on discrimination in the granting of credit prohibits discrimination on the basis of sex or marital status only. Currently, a complainant would have to seek remedy from the Department of Workforce Development, Division of Equal Rights under the Open Housing Law.

ACTION TO ADDRESS IMPEDIMENT #3: LOCAL DISCRIMINATION IN CONSUMER LENDING.

The Wisconsin Department of Financial Institutions (DFI) has amended ss. DFI-Bkg 80.85 (1) and (2), and created s. DFI-BKG 80.85 (5), Wis. Admin Code (DFI-WCA1 Wisconsin Consumer Act), effective 09/17/05, to expand the bases of discrimination for consumer lending by banks. The rule makes discrimination on a prohibited basis in the granting or extension of credit an

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unconscionable credit practice. The rule now defines prohibited basis to include sex, marital status, age provided the applicant has the capacity to enter into a binding contract, race, creed, religion, color, disability, national origin, ancestry, sexual orientation, or membership in the military forces of the United States or this state; that all or part of the applicant's income derives from any public assistance program; and that the applicant has in good faith exercised any right under the Consumer Credit Protection Act or any state law.

IMPEDIMENT #4: PREDATORY LENDING.

While the effects of past predatory lending can still be seen across the state, and loans with abusive terms have created hardships among thousands of vulnerable households, recently enacted Wisconsin and federal laws have all but eliminated any new predatory loan activities from occurring. Stronger regulatory standards and heightened consumer awareness have improved lending practices in the state.

ACTION TO ADDRESS IMPEDIMENT #4: PREDATORY LENDING.

Although recent law changes have improved the lending environment, DFI continues to closely monitor mortgage bankers, brokers, and originators. In addition, they have made available some foreclosure prevention funds to assist borrowers that may still be affected by lending practices of the past.

In addition, DEHCR staff continues to support homebuyer education which includes predatory lending training. Lending options, which includes a predatory lending discussion, is part of mandatory homeowner education that all households receiving homebuyer assistance are required to attend.

Finally, one of the required activities in DEHCR's annual fair contract, currently with the Metropolitan Milwaukee Fair Housing Council (MMFHC), is to provide information and training on Fair Lending Laws and practices.

IMPEDIMENT #5: PREDATORY APPRAISALS.

Predatory appraisals, whether due to collusion between appraisers and lenders or due to pressure put on appraisers by a third party, decrease the affordability of housing by increasing fees that are based on the value of the home, and can result in decreased equity from homeownership. Legal protection against predatory appraisals is limited. Appraisers are required by statute and professional ethics guidelines to appraise properties honestly, rather than on a predetermined basis.

ACTION TO ADDRESS IMPEDIMENT #5: PREDATORY APPRAISALS.

The changes in state and federal laws that regulate lending practices have made predatory appraisals less common statewide.

In Wisconsin, a real estate appraiser is a person engaged in the practice of real estate appraisal. Real estate appraisal means providing an analysis, opinion, or conclusion relating to the nature, quality, value, or utility of specified interests in or aspects of real estate. Wisconsin grants three types of credentials; licensed appraiser, certified residential appraiser, and certified general appraiser.

Federal mandate requires that after January 1, 1993, all appraisers must be licensed or certified by a state licensing agency in order to conduct appraisals which involve "federally related

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transactions." However, appraisers are not required to be licensed or certified in Wisconsin in order to perform "non-federally related transactions."

Licensing involves taking and passing a real estate appraisal exam. A handbook has been prepared by the Wisconsin Department of Safety and Professional Services to help applicants prepare for the exam. Among the subjects covered are social, governmental, legal, and regulatory aspects of real estate markets.

IMPEDIMENT #6: HOUSING STOCK.

The housing stock in Wisconsin provides limited housing choices for people with mobility impairments and for large families. Much of Wisconsin's housing stock is older and is not accessible for people with mobility impairments to do an initial inspection, thus limiting housing choice.

Housing choices for larger families are limited due to occupancy standards and the low availability of homes with many bedrooms. According to the 2018 American Community Survey, approximately 60 percent of Wisconsin's total housing units had three or more bedrooms. However, in rental housing, more than 76 percent of the rental housing stock had two or fewer bedrooms.

ACTION TO ADDRESS IMPEDIMENT #6: HOUSING STOCK.

Homebuyer new construction houses that were completed and occupied during this time period were constructed to provide for first floor access.

State-administered housing programs address the need for rental units for larger families through the HOME housing programs, including HOME-RHD, which continues to fund projects with three, four, or occasionally more bedrooms. The WHEDA LIHTC and HTF programs provide preference points for developing large family units (3-bedroom or larger), units intended for occupancy by residents with special needs, and units with accessible design.

HOME-RHD funds projects with 0 (efficiency) bedrooms, up to four, or occasionally more bedrooms, and partners with WHEDA LIHTC on many of these projects.

For this reporting period, CDBG, HOME, HTF, and state-funded programs continued to provide housing assistance for special needs households.

IMPEDIMENT #7: LANGUAGE BARRIERS.

Wisconsin is home to many people who speak English as a second language (ESL) with varying levels of competency in the English language. It is possible that this population will continue to increase due to immigration. Wisconsin's ESL population tends to be lower-income, and thus have limited resources. Households with limited English language capacity are statistically less likely to be aware of their rights and of resources available to aid in cases of housing discrimination. In addition, these households may not be aware of other housing resources available, putting these households at a disadvantage in securing housing. Even households that are relatively fluent in English may find it easier to understand documents available in their first language.

ACTION TO ADDRESS IMPEDIMENT #7: LANGUAGE BARRIERS.

Some of DEHCR's grantees have access to interpreters to help conduct outreach and translate information for non-English speaking persons. They also produce non-English language program brochures.

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DEHCR provided $62,150 in PY 25 for a contract with the Metropolitan Milwaukee Fair Housing Council (MMFHC) to address language barriers and to undertake a variety of fair housing related activities in both HOME entitlement and non-entitlement areas, including:

- **Fair housing complaint intake, investigation and referrals.** MMFHC received and processed complaints regarding discrimination based on race/color, national origin, sex, religion, disability, familial status, age, marital status, lawful source of income, sexual orientation, and ancestry.

- **Conducting fair housing testing**. As a method of investigating complaints, MMFHC conducted fair housing testing activities, including activities in HOME non-entitlement areas to determine if treatment of various home seekers was occurring in areas around the state.

- **Offering referral services to clients with non-fair housing inquiries.** MMFHC provided referral services to clients with questions on topics such as rent abatement, code violations, evictions, and repair-related concerns, including those in HOME non-entitlement areas.

- **Technical assistance in fair housing to Wisconsin residents, housing providers, and social service agencies throughout Wisconsin.** MMFHC provided technical assistance, including instances in HOME non-entitlement areas to the general public, government agencies, housing providers, social service agencies and attorneys. The assistance provided included clarification of fair housing law, information on legal and/or administrative interpretation of the law, information on the nature and extent of housing discrimination, unfair lending, and mortgage rescue scams.

- **Distribution of fair housing and fair lending educational materials.** MMFHC distributed significant fair housing and fair lending materials on numerous occasions throughout Wisconsin.

- **Conducting presentations, workshops, or trainings to provide information on fair housing and fair lending laws and practices.** MMFHC planned and conducted workshops in in various locations around the state that covered fair housing law, fair lending, and predatory lending.

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CR-40 MONITORING-91.220(D,E); 91.520 (C)

Describe the standards and procedures that will be used to monitor activities carried out in furtherance of the plan and will be used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

CDBG

Units of General Local Government who receive CDBG funding in the CDBG-PF, CDBG-PLNG, CDBG-PFED, and/or CDBG-ED program are monitored prior to project completion. A risk matrix is completed prior to monitoring to identify risk criteria. While a desk monitoring is conducted for all projects, the outcome of the risk matrix assessment may determine the scope of a desk monitoring and may also lead to and on-site monitoring visit. Section 3 and MBE/WBE contractor utilization and Section 3 worker tracking is reported by grantees. Funded projects are evaluated for consistency with the scope of work as presented in the UGLG's grant application and as listed in their grant agreement; and the UGLG's progress and timeliness with activities and reporting.

Annually, the CDBG-H program develops a risk analysis of the grantees to prioritize grantees for monitoring. Each of the CDBG-H Regions are monitored yearly for compliance. In addition, the program staff conducts two monitoring reviews each month on the locally-held Revolving Loan Funds for program compliance. Among the items included in the review are:

- Financial management records,
- LMI benefit,
- Program outreach efforts,
- Administrative files,
- Individual project files, and
- On-site inspection of completed projects.

Program staff work with grantees to correct any identified deficiencies through the monitoring process. DEHCR annually lists its monitoring plan for the program year on its website including monitoring goals by program.

HOME

Grantees are monitored once a year. Annually, the HOME-HHR housing program develops a risk analysis of the grantees to prioritize grantees for desk or on-site monitoring. Based on the number of grantees, program staff conducts two monitoring reviews each month for compliance. Any findings and concerns are documented, and a corrective action is developed to ensure long term compliance of program requirements. The HOME-HHR program did not produce additional affordable rental housing units in PY 25.

HOME-RHD program staff develops a risk analysis of projects that are within their affordability period. Staff determine how often to monitor projects based on the results of the analysis. The program staff monitors all projects within twelve months of project completion, and then, based on the results of the risk analysis, projects are scheduled for monitoring at least once every three years. The HOME-RHD program staff conducts a minimum of two monitoring reviews each month; however, they frequently conduct additional monthly monitoring depending on the number of projects identified during the risk analysis.

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Additionally, HOME-RHD has a Memorandum of Understanding (MOU) with WHEDA to jointly conduct on-site monitoring. Projects that receive on-site monitoring conducted by WHEDA undergo desk monitoring by program staff. Staff issues a formal monitoring letter to the grantee after completing the monitoring inspection. The letter outlines any issues or concerns found during the monitoring, identifies corrective action(s), and issues a date by which the grantee must have all actions completed.

Among the items included in HOME-HHR and HOME-RHD reviews are:

- Financial management records,
- LMI benefit,
- Program outreach efforts,
- Administrative files,
- Individual project files, and
- On-site inspection of completed projects.

All HOME TBRA grantees have onsite monitorings conducted annually to ensure compliance with HOME regulations and DEHCR policies. New HOME TBRA grantees may have monitorings conducted biannually during their first year of the contract period; a desk monitoring may be conducted after six months of the contract start date, and an onsite monitoring may be conducted after twelve months of the contract start date.

The following items are reviewed during the monitoring process:

- Program policies and procedures
- Fiscal policies and procedures
- Payroll records
- Financial expenditures
- Client files
- Onsite NSPIRE inspections of two TBRA-subsidized units

DEHCR continues to update its program manual to ensure grantees have a comprehensive resource of TBRA program requirements.

ESG

ESG grantees are monitored on an annual basis to ensure compliance with ESG program requirements. A risk assessment is completed prior to monitoring to identify risk criteria and prioritize grantees for either desk or on-site monitoring. Included in the monitoring is a review of agency policies, fiscal procedures, programmatic procedures, and client files. Program staff work with grantees to correct any deficiencies identified through the monitoring process. DEHCR regularly updates the ESG program manual to ensure grantees have an immediate resource when they have questions about ESG requirements.

HOPWA

HOPWA program project sponsors and subgrantees are monitored on an annual basis. During the monitoring process, programmatic procedures, fiscal procedures, client files, a HOPWA NSPIRE standards inspection, and interviews with HOPWA clients are completed.

HTF

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A team of DEHCR and WHEDA staff members are dedicated to reviewing results of competitive allocation rounds and coordinating all program processes. DEHCR and WHEDA have staff assigned to administer HTF required activities. As DEHCR transitions to full administration of the HTF program, WHEDA continues to administer activities associated with prior loans. Program requirements are clearly communicated with developers prior to closings and monitored throughout construction by both WHEDA and DEHCR staff. Coordination between WHEDA and DOA occurs to ensure program environmental requirements are adhered to prior to deployment of funds. A cost certification is collected at project completion to ensure HTF dollars are going towards supporting households at or below 30% AMI. Borrowers provide a guarantee against any non-compliance with program regulations. 20% of HTF dollars are held back until construction completion.

HOME-ARP

During construction, HOME-ARP RHD projects are reviewed for Labor Standards, MBE/WBE, and Section 3 compliance. Projects are monitored at completion, again within twelve months of project completion, and then every three years thereafter. Additionally, every year, each project's compliance with HOME-ARP rent limits, and financial strength is reviewed.

All HOME-ARP Supportive Services and Administrative grantees are monitored at least once during the performance period. The monitoring includes:

- Program policies and procedures
- Fiscal policies and procedures
- Payroll records
- Financial expenditures
- Client files

If areas of non-compliance are identified, a corrective action plan is provided to the grantee. DEHCR works with grantees closely to provide technical assistance throughout the process to help the grantee get back into compliance as quickly as possible.

Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Consistent with its Communication Plan, DEHCR posted notice in the May 21, 2026 and May 28, 2026 issues of the Wisconsin State Journal that a public hearing would be held for input regarding the CAPER. An in-person Public Hearing was held on June 4th with an option to attend telephonically including directions for accessing the public hearing were provided in the public notice. DEHCR posted the draft 2025 Consolidated Annual Performance and Evaluation Report (CAPER) on the Division's website.

The public input process lasted 15 days, beginning on June 4, 2026 and ending June 19, 2026. DEHCR submitted the CAPER to HUD by the deadline of June 30, 2026. DEHCR read, responded to, and recorded every comment received. To the extent possible, DEHCR incorporated public comments into the 2025 CAPER. No public comments were received during the comment period.

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CR-45 CDBG-91.520(C)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In order to meet its job creation goals, DEHCR will work to increase marketing efforts for the Community Development Block Grant programs that create LMI jobs. Under the current economic environment of inflationary increases and market uncertainties, businesses are more averse to the risks involved with building or expanding operations and their labor force and committing to comply with the comprehensive CDBG program requirements. This barrier can be overcome through marketing and outreach to local stakeholders and by providing training to make the rules and regulations seem more manageable.

The CDBG-H program continues to prioritize homeowner rehabilitation. DEHCR exceeded its estimated number of units rehabilitated and the CDBG-H program significantly improved the safety and efficiency of homes for the clients served. The CDBG-H program has experienced a shortage of contractors to work in the program; this is especially true of trade contractors, including plumbers and electricians. In addition, the CDBG-H program has seen a rise in the number of projects exceeding $50,000 to make the property decent, safe, and sanitary.

During PY 20, CDBG-CV funds were received to prevent, prepare for, and respond to COVID-19. Eligible CDBG-CV programs in this CAPER continued from the prior program year. During PY 23, the following objectives were met: create economic opportunities, provide decent affordable housing opportunities, create suitable living environments.

Does this jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

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CR-50 HOME (HOME GRANTEES ONLY)-91.520(D)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations. Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The HOME-HHR program did not produce additional affordable rental housing units in PY 25.

The following HOME-TBRA projects were inspected on-site this program year based upon the monitoring schedule:

1. West CAP (two TBRA-subsidized units)
2. Northwest Wisconsin Community Services Agency (one TBRA-subsidized unit)
3. Salvation Army of Burnett County (two TBRA-subsidized units)
4. Western Dairyland EOC (two TBRA-subsidized units)
5. North Central CAP (two TBRA-subsidized units)
6. Newcap (two TBRA-subsidized units)
7. Lakeshore CAP (two TBRA-subsidized units)
8. Couleecap (one TBRA-subsidized unit)
9. ADVOCAP (two TBRA-subsidized units)
10. Appleton Housing Authority (two TBRA-subsidized units)
11. Central Wisconsin Community Action Council (two TBRA-subsidized units)
12. Renewal Unlimited (one TBRA-subsidized unit)

During PY25, several issues were identified across the HOME TBRA monitorings including habitability standards, lease renewal documentation, program policies, and client file documentation. Most habitability standard issues were identified and resolved in a timely manner. Administrative issues can be resolved with additional training, modernizing program policies and procedures, and communication.

The following HOME-RHD projects were inspected on-site this program year based upon the monitoring schedule:

1	RHDC-1602	John Wenum Family Apartments
2	RHDC-2104	Gomoll
3	RHDC-1308	Rolan Senior Village
4	RHD-1703	Charlie Krupa School View Senior Village
5	RHDC-0625	Community Housing Project #1
6	RHDC-0871	Community Housing Project #6
7	RHD-0879	Lincoln School Apartments (Aka Norbert Schmidt Villa)
8	RHD-2301	Hogan Street Cottages
9	RHDC-0631	Community Housing Project #4
10	RHDC-0750	Community Housing Project: Bitters Avenue
11	RHDC-0983	Community Housing Project #7

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12	RHDC-0519	Brodhead Senior Village
13	RHDC-0408	Poplar Acres
14	RHD-1310	Park View
15	RHD-1901	Prairie Haus
16	RHDC-0515	Oak Hill
17	RHD-1902	Berkshire (GenCap Stevens Point 88, LLC)
18	RHDC-1601	Colby Cottages
19	80208.174.069	One Penny Place/Northwoods Senior
20	RHD-2101	Grove (Berkshire at the Grove)
21	RHD-1413	New Hope
22	RHDC-0981	Colby Senior Village (Colby Abbotsford Senior Village)
23	RHD-0757	Red Cliff Housing, Phase 1
24	RHD-1607	Cranberry Woods Townhomes
25	RHD-1306	Jefferson Street Apartments
26	RHD-1516	Atrium Lofts
27	RHD-1109	Craftsman Village Townhomes
28	RHD-1512	Grand View Townhomes
29	RHDC-0624	Foxfire Senior Village
30	RHDC-0767	Thorp Project
31	RHDC-1605	Pine Meadows
32	RHD-1114	Fair Acres Townhomes
33	RHD-1514	Cottages of Superior, Phase II
34	RHD-2102	Oak Meadow De Pere, LLC
35	RHDC-1603	Nekoosa Senior Village
36	RHDC-0405	Iron County Housing II
37	RHD-1115	Kenwood Senior Living
38	RHDC-1313	Dancing Oaks Cottages
39	RHDC-1702	Abbey Grove
40	RHDC-1904	The 1300, LLC
41	RHD-1007	Woodfield Village II
42	RHD-1513	Exchange @ 104
43	RHD-0745	Windmill Place
44	RHD-0992	Vista Valley Apartments
45	RHD-1507	Woolen Mills Lofts
46	RHD-0986	Superior Townhomes
47	RHD-2406	VUE14
48	RHD-1911	City Center Brillion
49	RHD-0752	Golden Apartments
50	RHD-0996	Redwood Terrace

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51	RHD-1304	Nicolet townhomes
52	RHD-1307	Historic Lincoln School
53	RHD-1908	Horicon School Apartments
54	RHD-1511	Bayshore Townhomes
55	RHD-1903	Crescent Lofts
56	RHD-2202	Superior View
57	RHD-2302	Forest Edge Apartments
58	RHD-0984	River Cities Redevelopment (Foxview Manor)
59	RHDC-0517	Sunrise Meadow II
60	RHDC-1132	Parkview
61	RHD-1099	Rosewood Apartments, Phase II
62	RHD-1510	Cottages of Superior, Phase I
63	RHD-2404	Lindoo School Apartments
64	RHD-1905	Oak Grove Development, Phase 2
65	RHDC-0406	Fox River Senior Village
66	RHD-0869	St. Peters
67	RHD-2105	Berkshire Ashwaubenon
68	RHD-1509	Historic Washington School Apartments
69	RHD-1005	Eagle Flats
70	RHD-1608	Whispering Echoes Townhomes
71	RHD-0734	Villas of Combined Locks
72	RHD-0755	Crossing Meadows (Ellsworth)
73	RHD-2403	Aspen Grove
74	RHDC-2303	Harvey Dueholm
75	RHDC-1006	Chippewa Senior Housing/Homestead Village II
76	RHD-2203	Rise Apartments
77	RHD-2502	Aurora Place
78	RHD-2503	Woods Hollow
79	RHDC-2412	Meadowlark (Ellsworth III)
80	RHD-2504	The Corridor
81	RHD-2407	Main Street Apartments *
82	RHD-2410	Impact St. Croix Falls Homes (Maple Wood Cottages) *
83	RHD-2411	Carmichael Phase II, LLC (a/k/a Maxwell II)
84	RHD-2501	PDC Cottages *
85	RHD-2405	Reedsburg Family *
86	RHD-2408	River North *

A summary of issues that were detected over PY 25 during HOME-RHD on-site monitoring inspections include: income eligibility documentation, lease documentation, property standards, rent calculations

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and tenant selection plan. Most issues are administrative in nature and can be resolved with changes to site management policy or updating language in notice to applicants or residents.

HOME-ARP

The two HOME-ARP RHD projects that were completed were both monitored.
1. HOME-ARP 24-07 – Portside Lofts (Algoma, Kewaunee County);
2. HOME-ARP 24-08 – Hope Village Apartments (Chippewa Falls, Chippewa County)

Issues Found: Kitchen cabinet door wasn't properly attached, electric outlet cover plates were missing, and a loose toilet.
Corrective Action: Grantee addressed the problem within 24 hours.

Provide an assessment of the jurisdictions' affirmative marketing actions for HOME units.

HOME and HOME-ARP recipients used the established affirmative marketing policies and procedures that HOME recipients must adopt. These policies and procedures are based upon the Code of Federal Regulations (CFR), specifically 24 CFR 92.351. HOME and HOME-ARP recipients must make an effort to inform potential applicants from all racial, ethnic, and gender groups in the housing market about available vacant units. In particular, they must inform persons in the housing market area that are not likely to apply for HOME-assisted housing.

During the program year, DEHCR did not receive any complaints concerning its recipients' affirmative marketing practices.

Data on the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

$3,563,011.91 of new HOME program income was receipted into IDIS for the 2025 program year. Three HOME-RHD projects were funded using program income in PY 25: Aurora Place, Corridor Apartments, and Archive Apartments.

Aurora Place is a proposed 40-unit new construction activity in the City of Washburn. The activity will develop four (4) one-story buildings, containing ten (10) units each. The activity will include a mix of one, two and three-bedroom sized units, providing eleven (11) HOME assisted units. The owner is Cinnaire Solutions Corporation via Aurora Place, LLC, A Wisconsin Limited Liability Company.

The Corridor apartments is a proposed 55-unit new construction activity in the City of Oshkosh. The activity will produce three (3) buildings: a 39-unit 3-story building and two (2) 2-story 8-unit buildings. The activity will contain a mix of one, two and three-bedroom sized units. The activity will contain eleven (11) HOME assisted units. The owner is Commonwealth Development Corporation via The Corridor Development, LLC, a Wisconsin Limited Liability Company.

Archive Apartments is a proposed new construction activity to develop one (1) 4-story elevatored building containing 40 units in the City of Appleton. The proposed development will be comprised of 18 one-bedroom, 15 two-bedroom, and 7 three-bedroom units. The project will provide nine (9) HOME assisted units. The owner is Mosaic Development, LLC via Archive Apartments, LLC, A Wisconsin Limited Liability Company.

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Other actions taken to foster and maintain affordable housing. STATES ONLY: Including the coordination of LIHTC with the development of affordable housing.

The HOME-RHD program issues HOME project funds to increase the amount of existing affordable rental housing within the state. The program also monitors grantees to ensure compliance with affordability regulations. A major directive of the monitoring process is to ensure residents of HOME-assisted units are income-compliant with program stipulations. The HOME program is a consistent driver of new affordable housing stock within the state, as well as maintainer of existing affordable stock.

The HOME-RHD program routinely coordinates with WHEDA (Wisconsin's LIHTC-dispersing entity) to fund construction of new affordable housing stock and rehabilitate existing affordable housing stock. There are currently over 75 active projects in Wisconsin that contain both HOME and LIHTC funding.

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CR-55 HOPWA (HOPWA GRANTEES ONLY)-91.520(E)

Number of Households Served Through	One-year Goal	Actual
Short-term rent, mortgage and utility assistance to prevent homelessness of the individual or family	147	84
Tenant-based rental assistance	0	22
Units provided in permanent housing facilities developed, leased or operated with HOPWA funds	0	27
Units provided in transitional short-term housing facilities developed, leased or operated with HOPWA funds	0	0
Total	147	133

Table 14 – HOPWA Number of Households Served

While the program did not fully meet its overall housing assistance goals due to lower-than-anticipated utilization of STRMU assistance, program outcomes reflect a positive shift towards more stable and proactive housing interventions. Increased utilization of TBRA and PHP demonstrate a growing program capacity to identify housing needs earlier, connect households to permanent housing opportunities, and stabilize participants before housing crisis escalates to the level of requiring STRMU intervention. This suggests that supportive services, and in particular case management, are effectively strengthening the coordination between housing placement, long-term rental assistance, and ongoing client support, allowing more households to move directly into stable housing situations rather than relying on short-term crisis assistance. In this way, while the projected housing assistance goal was not fully achieved, the data does suggest continued progress toward strengthening coordinated housing stabilization strategies focused on rapid placement, long-term affordability, and housing retention.

In PY24, the focus was on creating efficient processes; In PY25, the focus was on enacting those efficiencies. To continue this progress, the WI HOPWA program will continue expanding landlord engagement efforts to increase the availability of units willing to participate in TBRA and PHP. DEHCR will also continue to improve its internal care coordination systems to ensure that client needs are identified and addressed in a timely manner.

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CR-56 HTF- 91.520 (H)

Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.

The Division of Energy, Housing, and Community Resources (DEHCR) submitted the 2025 allocation plan, with the goal of creating 74 units through the Housing Trust Fund program for extremely low-income households. DEHCR and WHEDA offered two opportunities for applicants to request Housing Trust Funds in 2025. WHEDA and DEHCR conducted a competitive round of applications for the allocation of HTF, in concurrence with the LIHTC application cycle, in December 2025, and DEHCR and WHEDA conducted a competitive application cycle for any projects serving extremely low-income residences in the spring of 2025.

During PY 25, twelve projects supported with HTF funding completed construction and a total of 731 units were placed into service. Of these units 132 were funded with HTF funds. In addition, during the program year, there were additional projects funded from previous allocations of Housing Trust Funds that closed on the funding, resulting in 462 total units that are currently under construction, of which 111 will be designated as HTF units.

Tenure Type	0-30% AMI	0% of 30+ to poverty line	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Rental	132	0	205	337	0	337
Homebuyer	0	0	0	0	0	0

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CR-60 ESG 91.520(G) (ESG RECIPIENTS ONLY)

ESG Supplement to the 2025 CAPER

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	WISCONSIN
Organizational DUNS Number	809036098
EIN/TIN Number	396028867
Identify the Field Office	MILWAUKEE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Wisconsin Balance of State CoC, Milwaukee COC, Madison/Dane CoC, Racine CoC

ESG Contact Name

Prefix	Mr.
First Name	David
Middle Name	0
Last Name	Pawlisch
Suffix	0
Title	Administrator

ESG Contact Address

Street Address 1	101 E. Wilson St., 5th Floor
Street Address 2	0
City	Madison
State	WI
ZIP Code	-
Phone Number	(608) 266-7531
Extension	0
Fax Number	0
Email Address	David.Pawlisch@wisconsin.gov

ESG Secondary Contact

Prefix	Mr.
First Name	Landon
Last Name	Williams
Suffix	
Title	Policy Initiatives Advisor
Phone Number	(608) 267-9376
Extension	
Email Address	Landont.Williams@wisconsin.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	04/01/2025
Program Year End Date	03/31/2026

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3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: WEST CENTRAL WI COMMUNITY ACTION AGENCY, INC
City: Glenwood City
State: WI
Zip Code: 54013, 8556
DUNS Number: 030016844
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 171,268

Subrecipient or Contractor Name: COMMUNITY ACTION COALITION OF SOUTH CENTRAL WISCONSIN
City: Madison
State: WI
Zip Code: 53704, 2605
DUNS Number: 07895681
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 176,293

Subrecipient or Contractor Name: GREEN COUNTY HUMAN SERVICES
City: Monroe
State: WI
Zip Code: 52566
UEI Number: KSQABKLF78M8
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Unit of Government
ESG Subgrant or Contract Award Amount: 108,159

Subrecipient or Contractor Name: ADVOCAP INC.
City: Fond Du Lac
State: WI
Zip Code: 54935, 4122
DUNS Number: 078934148
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 184,888

Subrecipient or Contractor Name: NORTH CENTRAL CAP INC
City: Wisconsin Rapids
State: WI
Zip Code: 54495, 1141
DUNS Number: 096826086
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 83,604

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Subrecipient or Contractor Name: RENEWAL UNLIMITED INC.
City: Portage
State: WI
Zip Code: 53901, 3400
DUNS Number: 099140790
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 102,676

Subrecipient or Contractor Name: WESTERN DAIRYLAND ECONOMIC OPPORTUNITY COUNCIL
City: Independence
State: WI
Zip Code: 54747, 0125
DUNS Number: 084490762
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 194,019

Subrecipient or Contractor Name: NEWCAP, INC.
City: Oconto
State: WI
Zip Code: 54153, 1541
DUNS Number: 136478786
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 185,155

Subrecipient or Contractor Name: FAMILY PROMISE OF OZAUKEE COUNTY
City: Port Washington
State: WI
Zip Code: 53074
DUNS Number: 059578735
Is subrecipient a victim services provider: Y
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 142,233

Subrecipient or Contractor Name: MADISON, CITY OF
City: Madison
State: WI
Zip Code: 53701, 2983
DUNS Number: 076147909
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Unit of Government
ESG Subgrant or Contract Award Amount: 280,503

Docusign Envelope ID: 55CD5DDC-C19E-81BA-80A4-54F9BD8100CC

Subrecipient or Contractor Name: KENOSHA HUMAN DEVELOPMENT SERVICES, INC.
City: Kenosha
State: WI
Zip Code: 53140, 3715
DUNS Number: 080500861
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 238,089

Subrecipient or Contractor Name: NORTHWEST WI CSA, INC.
City: Superior
State: WI
Zip Code: 54880, 1523
DUNS Number: 153452248
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 140,558

Subrecipient or Contractor Name: YWCA – OF THE COULEE REGION
City: La Crosse
State: WI
Zip Code: 54603, 1755
DUNS Number: 941006900
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 172,764

Subrecipient or Contractor Name: EVERYONE COOPERATING TO HELP OTHERS (ECHO), INC
City: Janesville
State: WI
Zip Code: 53548, 3842
DUNS Number: DWQXFZ6Y7FN4
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 128,774

Subrecipient or Contractor Name: LAKESHORE CAP, INC.
City: Manitowoc
State: WI
Zip Code: 54220, 4034
DUNS Number: 611777327
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 88,105

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Subrecipient or Contractor Name: APPLETON, CITY
City: Appleton
State: WI
Zip Code: 54911, 4702
DUNS Number: 053090312
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Unit of Government
ESG Subgrant or Contract Award Amount: 179,891

Subrecipient or Contractor Name: THE SALVATION ARMY OF BURNETT COUNTY, WI
City: Siren
State: WI
Zip Code: 54872, 8042
DUNS Number: 150777253
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 113,578

Subrecipient or Contractor Name: House of Hope, Inc.
City: Green Bay
State: WI
Zip Code: 54303, 2665
DUNS Number: 618259688
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 416,572

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Subrecipient or Contractor Name: FAMILY PROMISE OF WASHINGTON COUNTY
City: West Bend
State: WI
Zip Code: 53095
DUNS Number: 961923401
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 155,762

Subrecipient or Contractor Name: INSTITUTE FOR COMMUNITY ALLIANCES
City: Madison
State: WI
Zip Code: 53703 2731
DUNS Number: FD8JNZNSLPN8
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 200,000

Subrecipient or Contractor Name: HEBRON HOUSING SERVICES
City: Pewaukee
State: WI
Zip Code: 53072, 3779
DUNS Number: ZXHJA42NZBB3
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 147,294

Subrecipient or Contractor Name: CAP SERVICES, Inc.
City: Stevens Point
State: WI
Zip Code: 54481
DUNS Number: K2NBW5B43X68
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 42,700

Subrecipient or Contractor Name: HO-CHUNK NATION OF WISCONSIN
City: Black River Falls
State: WI
Zip Code: 54615
DUNS Number: E14CPCHZGAC3
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Unit of Government
ESG Subgrant or Contract Award Amount: 40,000

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CR-65 ESG PERSONS ASSISTED (ESG RECIPIENTS ONLY)

This requirement is replaced by the SAGE System requirement.

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CR-70 ESG ASSISTANCE PROVIDED (ESG RECIPIENTS ONLY)

8. Shelter Utilization

	Number of Units
Number of New Units - Rehabbed	-
Number of New Units - Conversion	-
Total Number of bed-nights available	1,358,895
Total Number of bed-nights provided	855,995
Capacity Utilization	62.99%

Table 15 – Shelter Utilization

9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

Emergency Solutions Grant (ESG) funding was distributed using a formula incorporating need and performance data, with a goal of rewarding those who are best aligning their homeless service systems towards preventing and ending homelessness. The formula distributes funding among predetermined county groupings based on historical partnership for previous grant competitions, the HUD Continuum of Care process, and geographic proximity.

In 2025, a meeting was held with various stakeholders, including the Wisconsin HUD Continua of Care, to discuss the funding formula and determine the best elements to include. Based on the results of that meeting, the funding formula was revised to include HMIS data describing homelessness, an average of monthly census counts, poverty level data, and HUD system performance measures (including successful placement in or retention of permanent housing and returns to homelessness).

Local homeless coalitions were also required to use performance data when distributing funds at the local level.

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CR-75 ESG EXPENDITURES (ESG RECIPIENTS ONLY)

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year			
		2023	2024	2025
Expenditures for Rental Assistance		27,273	64,729	66,603
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			19,913	6,452
Expenditures for Housing Relocation & Stabilization Services - Services		40,496	37,191	72,751
Expenditures for Homeless Prevention under Emergency Shelter Grants Program				
Subtotal Homelessness Prevention		**67,769**	**121,833**	**145,806**

Table 16 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year			
		2023	2024	2025
Expenditures for Rental Assistance		347,755	308,730	415,398
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance		42,610	36,159	32,476
Expenditures for Housing Relocation & Stabilization Services - Services		525,538	557,515	559,804
Expenditures for Homeless Assistance under Emergency Shelter Grants Program				
Subtotal Rapid Re-Housing		**915,903**	**902,404**	**1,007,679**

Table 17 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year			
		2023	2024	2025
Essential Services		765,128	780,302	653,725
Operations		1,042,698	1,100,451	711,296
Renovation				5,854
Major Rehab				
Conversion				
Subtotal		**1,807,826**	**1,880,753**	**1,370,876**

Table 18 – ESG Expenditures for Emergency Shelter

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11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year			
		2023	2024	2025
HMIS		159,273	324,063	311,963
Administration		109,579	250,832	269,353
Street Outreach		120,116	108,022	117,644

Table 19 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2023	2024	2025
	3,180,466	3,587,907	3,223,321

Table 20 - Total ESG Grant Funds

11f. Match Source

	2023	2024	2025
Other Non-ESG HUD Funds	228,970	158,528	333,799
Other Federal Funds	304,770	598,475	421,095
State Government	1,217,924	894,295	911,802
Local Government	409,704	251,611	355,422
Private Funds	1,085,469	1,481,682	1,286,271
Other	369,229	434,554	426,127
Fees		9,952	-9,952
Program Income	0	0	0
Total Match Amount	**3,616,066**	**3,829,097**	**3,724,566**

Table 21 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2023	2024	2025
	6,796,532	7,417,004	6,947,887

Table 22 - Total Amount of Funds Expended on ESG Activities

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ADDITIONAL ACCOMPLISHMENTS REPORTING