



STATE OF WISCONSIN HOME-ARP ALLOCATION PLAN

STATE OF WISCONSIN, DEPARTMENT OF ADMINISTRATION
DIVISION OF ENERGY, HOUSING AND COMMUNITY RESOURCES
SUBSTANTIAL AMENDMENT – PUBLIC HEARING JULY 23, 2025; SUBMITTED
TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
AUGUST 29, 2025



Summary

This Substantial Amendment enables the State of Wisconsin to accept an additional \$244,906 in HOME-ARP funding allocated to the State by letter from the U.S. Department of Housing and Urban Development. In addition, the State has made adjustments to its current budget reflexive of cumulative demand as well as an updated forecast of needs.

Background

This Allocation Plan describes how the State of Wisconsin intends to utilize funds appropriated under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) (“ARP”) for the HOME Investment Partnerships Program (HOME). These funds were approved to provide homelessness assistance and supportive services. On March 11, 2021, President Biden signed the ARP into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds under the HOME program to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units. The program described in this Plan is the HOME-American Rescue Plan or “HOME-ARP.”

The ARP defines qualifying individuals or families as those that are (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above.

This Allocation Plan describes how the State of Wisconsin will utilize its \$41,859,563 HOME-ARP award to assist Qualifying Populations. It has been prepared based on HUD Notice CPD-21-10 (September 13, 2021) – Requirements for the Use of Funds in the HOME-American Rescue Plan Program, utilizing the HUD-provided template.

The Wisconsin Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) administers the HOME Program in Wisconsin. DEHCR will also administer HOME-ARP funds, under separate agreement with HUD. DEHCR has the staff, procedures, and systems in place to effectively administer HOME-ARP funds.

Participating Jurisdiction: State of Wisconsin
Substantial Amendment Public Hearing: July 23, 2025

Original Submission Date: June 28, 2022

Consultation

Summarize the consultation process:

DEHCR shall provide for and encourage local government, agency, and citizen participation in the development of its HOME-ARP, 2021 Allocation Plan (hereinafter “the Plan” or “Plan”). DEHCR shall undertake the following actions in these areas.

Encouragement of Participation—General

DEHCR shall encourage participation in the development of the Plan through the following means as appropriate:

- 1) Mass mailing paper copies or emailing electronic copies of notices to the assembled distribution lists of the DEHCR and local unit of government clerks;
- 2) Notices to the various media outlets;
- 3) Information dissemination at statewide affordable housing and homeless conferences and other relevant events;
- 4) Posting of public notices concerning the Plan on the Internet at the Wisconsin DOA-DEHCR website; and
- 5) An Online Plan survey and comment opportunity on the State of Wisconsin DOA-DEHCR website.

Participation of Public and Private Agencies

Public and private sector agencies that provide assisted housing, health services, social services, and economic development shall receive notification by mail or email of the Plan’s development. DEHCR shall encourage written and electronic comments and attendance at public hearings and use of the Wisconsin DOA-DEHCR website. In addition, DEHCR shall work with representatives from public and private agencies to help with data analysis and to provide feedback on Wisconsin’s housing needs and potential solutions.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Balance of State Continuum of Care	CoC	Letter	Please see Appendix A
Dane County Continuum of Care	CoC	Letter	Please see Appendix A
Milwaukee County Continuum of Care	CoC	Letter	No feedback received
Racine County Continuum of Care	CoC	Letter	No feedback received
Wisconsin Department of Children and	State Agency	Letter	Please see Appendix A

Families			
Wisconsin Department of Health Services	State Agency	Letter	Please see Appendix A
Wisconsin Department of Corrections	State Agency	Letter	Please see Appendix A
Wisconsin Department of Public Instruction	State Agency	Letter	No feedback received
Wisconsin Department of Veterans Affairs	State Agency	Letter	Please see Appendix A
Wisconsin Department of Workforce Development	State Agency	Letter	No feedback received
End Abuse WI	Domestic Violence Prevention Advocacy	Letter	Please see Appendix A
Judicare	Legal Aid	Letter	No feedback received
Legal Action Wisconsin	Legal Aid	Letter	Please see Appendix A
Wisconsin Association of Housing Authorities	Public Housing Authority Advocacy	Letter	No feedback received
Wisconsin Housing and Economic Development Authority	Public Housing Authority Administration and Housing Authority	Letter	Please see Appendix A
WISCAP	Community Action Program Advocacy	Letter	No feedback received

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Public comment period: start date- May 19, 2022 end date - June 19, 2022***
- ***Public hearing date: May 19, 2022***
- ***Public hearing for Substantial Amendment: July 23, 2025 end date August 22, 2025***

Please see Appendix C for comments received during the public comment period for the Substantial Amendment.

Describe any efforts to broaden public participation:

DEHCR shall provide for and encourage local government, agency, and citizen participation in the development of its Plan. DEHCR shall undertake the following actions in these areas:

Encouragement of Participation—General

DEHCR shall encourage participation in the development of its Allocation Plan through the following means as appropriate:

- 1) Mass mailing paper copies or emailing electronic copies of notices to the assembled distribution lists of DEHCR and local unit of government clerks.;
- 2) Notices to the various media outlets;
- 3) Listening sessions and information dissemination at statewide affordable housing and homeless conferences and other relevant events.
- 4) Posting of public notices concerning the Allocation Plan on the Internet at the Wisconsin DOA-DEHCR website.

Participation of Non-entitlement Municipalities and Other Units of Government

DEHCR shall notify non-entitlement municipalities and other units of government directly by email of the Plan's development process and by posting updates to its website.

DEHCR shall solicit ideas regarding the distribution method and priorities for housing and community development funds annually at related conferences and events. The target audiences are non-entitlement units of government, housing agencies, economic development associations, consultants, homeless and special needs service providers. DEHCR may engage the committee process when soliciting comments and input regarding program design.

Participation of Public and Private Agencies

Public and private sector agencies that provide assisted housing, health services, social services, and economic development shall receive notification by mail or email of the Plan's development. DEHCR shall encourage written and electronic comments and attendance at listening sessions, public hearings and use of the Wisconsin DOA-DEHCR website. In addition, DEHCR shall work with representatives from public and private agencies to help with data analysis and to provide feedback on Wisconsin's housing and services needs and potential solutions.

Public and quasi-public agencies include: the Wisconsin Economic Development Corporation (WEDC), the Wisconsin Housing and Economic Development Authority (WHEDA); the Departments of Health Services, Children and Families, Administration, Veterans Affairs, and Corrections, the University of Wisconsin, USDA Rural Development, and local county or nonprofit economic development associations.

Private agencies include grantee and applicant organizations of DEHCR which are located throughout the state, and statewide agencies such as: Foundation for Rural Housing; Wisconsin Community Action Program Association; and the Wisconsin Association of Housing Authorities.

Participation of Citizens

DEHCR shall encourage the participation by Wisconsin's citizens in the Plan's development process. In order to maximize the participation of citizens of low income, with mobility or other impairments, or with a language barrier, DEHCR shall, in addition to the steps outlined above:

- 1) Schedule hearings and forums at times and locations that are convenient to potential and actual beneficiaries.
- 2) Ensure that hearing and forum sites can accommodate persons with mobility impairments (the advertisement mentioned above will include this information).
- 3) Arrange for special communication accommodations in multiple languages, if notified by potential participants at least one week prior to the public hearing.
- 4) Accept comments via email and TTY in multiple languages.

Access to Information

DEHCR shall make available to units of local government, citizens, agencies, and other interested parties information on the amount of anticipated revenue for housing activities for the following year. Furthermore, DEHCR shall make available information on its proposed range of activities, including the estimated amounts of funds that are proposed to benefit persons of low and moderate income. DEHCR shall address and minimize any displacement that its activities would create. DEHCR will provide assistance to any persons displaced, will specify the types and levels of assistance DEHCR will make available (or require others to make available) to persons displaced, even if DEHCR expects no displacement to occur. This information will be available upon request.

Publication of Proposed Allocation Plan

DEHCR shall have the Plan available in print and by electronic means on the Internet.

The public comment period for the Plan will be at least 15 days. DEHCR shall publish a notice of the availability for comment in the Wisconsin State Journal on or before the first day of the comment period.

DEHCR shall publish a summary in the Wisconsin State Journal. This summary will include how the public can obtain copies or examine the Plan.

DEHCR shall mail printed copies of the original Plan to the main branches of the public libraries in the following communities: Appleton, Eau Claire, Green Bay, La Crosse, Madison, Marinette, Milwaukee, Platteville, Racine, Rhineland, Rice Lake, Richland Center, River Falls, Superior, and Wausau.

DEHCR shall also make copies available free of charge to the public, both in printed form and by electronic means. A reasonable number of copies will be printed; if that supply is exhausted, DEHCR shall provide additional copies in electronic form only.

Comments on programs contained in the Plan should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

DEHCR shall consider the comments it receives during the comment period as it prepares a final version of the Plan. DEHCR shall append a summary of these comments, both those accepted and those rejected, to the final Plan.

Summarize the comments and recommendations received through the public participation process:

Please see Appendix C for comments received during public comment period.

Summarize any comments or recommendations not accepted and state the reasons why:

Please see Appendix C for comments received and rejected during public comment period.

Needs Assessment and Gaps Analysis

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness, as defined in 24 CFR 91.5 on a given night	
	Sheltered	Unsheltered
Persons in Households with Adult(s) and Child(ren)	1,980	13
Persons in Households with Only Children	22	0
Persons in Households with Only Adults	2,241	282
Chronically Homeless Individuals	332	94
Chronically Homeless Families	107	0
Veterans	334	25
Unaccompanied Youth	22	0
Persons with HIV	6	0

The above table includes information gathered in the January 2019 Point-in-Time Count. A total of 4,538 persons were counted on this single point in time, a rate of homelessness of 10 people per 10,000 people. This rate is less than the national average of 19 people per 10,000 people.

Data in the following sections comes from the Institute for Community Alliances “The State Homelessness in Wisconsin 2019” report. The following table shows the number of persons accessing an emergency shelter in calendar year 2019 by Continuum of Care and by Local Continuum of Care in the Balance of State regions. Though 41% of clients experienced homelessness in Dane and Milwaukee Counties, the data also show that homelessness occurs at high rates in less populated areas of Wisconsin. Additionally, chronic homelessness, which is often presumed to be exclusively associated with the downtown core of urban areas, occurs across Wisconsin.

CoC*	Homeless Clients	Homeless Clients per 10,000 Residents	Children	Adult Men	Adult Women	Veterans	Chronically Homeless
BOS - Brown CoC	2,228	79	254	1,250	417	93	215
BOS - Central CoC	388	13	35	242	81	12	18
BOS - Coulee CoC	898	55	82	442	147	65	162
BOS - East Central CoC	434	22	51	265	88	14	16
BOS - Fox Cities CoC	942	47	70	536	179	52	106
BOS - Jefferson CoC	83	17	7	53	18	0	5
BOS - Kenosha CoC	748	42	69	459	153	15	52
BOS - Lakeshore CoC	480	19	55	291	97	16	21
BOS - North Central CoC	571	29	38	321	107	22	83
BOS - Northeast CoC	312	27	17	206	69	5	15
BOS - Northwest CoC	528	53	26	341	114	28	20
BOS - N*Wish CoC	135	17	17	75	25	7	11
BOS - Ozaukee	54	6	7	34	11	2	0
BOS - Rock Walworth CoC	926	40	81	591	197	10	47
BOS-Rural North	154	11	21	89	30	4	11
BOS - Southwest CoC	98	4	6	68	23	1	1
BOS - Washington CoC	113	11	6	75	25	1	6
BOS - Waukesha CoC	968	25	83	530	177	34	145
BOS - West Central CoC	950	30	89	570	190	36	65
BOS - Dairyland CoC	770	48	58	398	133	35	147
BOS - Winnebago Land CoC	588	20	46	345	115	36	46
Racine CoC	1,004	55	72	641	214	34	43
Milwaukee CoC	6,031	63	495	3,801	1,267	149	319
Dane CoC	3,252	68	303	1,741	580	144	484
Balance of State	12,368	31	1,118	7,178	2,393	488	1,192
State of WI	22,655	40	1,988	13,361	4,454	815	2,038

Population Within PJ Experiencing Housing Problems

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	213,972	33,775	13,862

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	160,904	27,391	9,238
Black / African American	31,090	3,621	2,188
Asian	4,109	413	1,048
American Indian, Alaska Native	2,768	921	280
Pacific Islander	64	0	0
Hispanic	12,594	1,021	922

**The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%.*

The table above shows that among extremely low-income households (0-30% area median income), 81.8% have one or more housing problems. There is a disproportionately greater need among extremely low-income Pacific Islander households. The rate of housing problems among extremely low-income Pacific Islander households is 100%, which is 18.2% greater than the jurisdiction as a whole. It should be noted that the total number of Pacific Islanders households within the 0-30% AMI income range is very small, being estimated at only 64 households. Pacific Islanders thus make up only .03% of all extremely low-income households with housing problems in Wisconsin.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	181,250	86,147	0
White	148,186	75,587	0
Black / African American	16,137	4,292	0
Asian	2,694	1,057	0
American Indian, Alaska Native	1,266	955	0
Pacific Islander	15	75	0
Hispanic	11,072	3,690	0

The table above shows that among low-income households (30-50% area median income) in Wisconsin, 67.8% have one or more housing problems. There is a disproportionately greater need among low-income Black/ African American households. The rate of housing problems among these Black/ African American

households is 79.0%, which is 11.2% greater than the jurisdiction as a whole.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	160,525	254,533	0
White	138,729	224,342	0
Black / African American	9,464	12,513	0
Asian	3,002	2,809	0
American Indian, Alaska Native	994	2,259	0
Pacific Islander	4	54	0
Hispanic	7,131	10,526	0

The table above shows that among moderate income households (50-80% area median income) in Wisconsin, 38.7% have one or more housing problems. There is a disproportionately greater need among moderate income Asian households. The rate of housing problems among these Asian households is 51.7%, which is 13.0% greater than the jurisdiction as a whole.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	65,705	200,240	0
White	59,177	181,022	0
Black / African American	2,182	7,530	0
Asian	1,234	2,085	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	499	1,781	0
Pacific Islander	4	14	0
Hispanic	2,222	6,735	0

The table above shows that among middle income households (80-100% area median income) in the State of Wisconsin, 24.7% have one or more housing problems. There is a disproportionately greater need among middle income Asian households. The rate of housing problems among these Asian households is 37.2%, which is 12.5% greater than the jurisdiction as a whole.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

Population Within PJ Experiencing Severe Housing Problems

0%-30% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	171,322	76,453	13,862
White	127,207	61,118	9,238
Black / African American	26,304	8,422	2,188
Asian	3,591	936	1,048
American Indian, Alaska Native	1,974	1,709	280
Pacific Islander	64	0	0
Hispanic	10,221	3,381	922

The above table shows that among extremely low-income households (0-30% area median income) in the State of Wisconsin, 65.5% have one or more severe housing problems. There is a disproportionately greater need among extremely low-income Pacific Islander households. The rate of severe housing problems among these Pacific Islander households is 100%, which is 34.5% greater than the jurisdiction as a whole. It should be noted that the total number of Pacific Islanders households within the 0-30% AMI income range is very small, being estimated at only 64 households. Pacific Islanders make up only .04% of all extremely low-income households with severe housing problems in Wisconsin.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

30%-50% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	72,126	195,085	0
White	58,371	165,409	0
Black / African American	6,170	14,268	0
Asian	1,481	2,244	0
American Indian, Alaska Native	385	1,836	0
Pacific Islander	15	75	0
Hispanic	5,185	9,540	0

The above table shows that among low-income households (30%-50% area median income) in Wisconsin, 27% have one or more severe housing problems. There is a disproportionately greater need among low-income Asian households. The rate of housing problems among these Asian households is 39.8%, which is 12.8% greater than the jurisdiction as a whole.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

50%-80% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	46,222	368,868	0
White	38,266	324,716	0
Black / African American	2,487	19,484	0
Asian	1,869	3,958	0
American Indian, Alaska Native	271	2,963	0

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	4	54	0
Hispanic	2,953	14,703	0

The above table shows that among moderate-income households (50-80% area median income) in the Wisconsin, 11.1% have one or more severe housing problems. There is a disproportionately greater need among moderate-income Asian households. The rate of housing problems among these Asian households is 32.1%, which is 20.9% greater than the jurisdiction as a whole.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

80%-100% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,517	252,782	0
White	11,235	229,287	0
Black / African American	586	9,141	0
Asian	704	2,607	0
American Indian, Alaska Native	253	2,031	0
Pacific Islander	0	18	0
Hispanic	682	8,277	0

The above table shows that among middle-income households (80-100% area median income) in Wisconsin, 5.1% have one or more severe housing problems. There is a disproportionately greater need among middle-income Asian households. The rate of housing problems among these Asian households is 21.3%, which is 16.2% greater than the jurisdiction as a whole.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,538,556	413,819	281,849	14,611
White	1,408,569	357,398	224,535	9,685
Black / African American	48,383	26,356	32,652	2,268
Asian	20,297	5,214	4,923	1,132
American Indian, Alaska Native	10,983	3,052	2,199	300
Pacific Islander	360	23	64	0
Hispanic	40,908	17,289	13,919	1,045

When examining severely cost burdened households in the table however, there is a disproportionate need among Black/ African American households. The percentage of households with a severe cost burden across Wisconsin is 12.5%, but among Black/ African Americans it is 29.8%; the rate of severe cost burden is 17.2% greater among Black/ African Americans.

Population includes: those at risk of homelessness as defined in 24 CFR 91.5, those fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD, and other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***

Forty one percent (41%) of persons experiencing homelessness in Wisconsin who sought services did so as members of a family or household as measured by the Institute for Community Alliances, the State of Homelessness in Wisconsin, 2019. Of the 22,655 total clients served during 2019, 37% were persons in families with adults and children.

All of Wisconsin's racial and ethnic groups are represented in the statistics of those who accessed homeless services in 2019. The largest racial group served are white (49.7%), a significant underrepresentation compared to the Wisconsin population as a whole. African Americans represent approximately 7% of the Wisconsin population (according to American Community Survey data) but 39.2% of the population accessing homeless services. This is a substantial overrepresentation, and one that has shown up in analysis of HMIS data in years past. Hispanics or Latinos are also overrepresented, representing 8.8% of the population accessing homeless services, but 7.1% of the total Wisconsin population. Those persons identifying as two or more races are also over-represented, with 6.2% of persons accessing homeless services, compared with 2.0% of the general population.

In the January 2019 Point-in-Time Count, 295 persons were unsheltered, and 4,243 persons were sheltered. In Wisconsin, unsheltered homelessness occurs at significantly lower rates than in other parts

of the country due to the cold winter climate. Cold weather may lead to doubling up or couch surfing by individuals who may otherwise be counted as homeless, especially in rural areas which lack homeless services. Unsheltered homeless rates are higher during the warmer months, according to data collected during the July Point-in-Time Count.

The State of Wisconsin has identified several housing and service needs for sheltered and unsheltered populations. In many communities across the state there exists shelter for households with minor children, single men and single women, but not a shelter for couples or other adult only households. However, many communities across the state have a waiting list for services. This indicates an increased need for emergency family shelters. Some of the people who remain unsheltered across the state remain so because they do not want to separate from their household. Communities often lack shelters for minors who are parenting. In addition, communities could benefit from additional transitional living program units for homeless youth. In many cases, a men's shelter, if available, is a night-time only facility. 24-hour facilities may better serve the needs of men to minimize transportation between facilities.

The pandemic has highlighted a need for medical respite shelter. While there are currently medical shelters for those with COVID related needs, the population of people experiencing homelessness have many healthcare needs. They are often undergoing treatments, having surgery, recovering from serious illness all while navigating the homeless services system. Healthcare navigation services for those who are homeless, so there is a connection to vaccinations, testing, and other types of healthcare. There is a significant need for behavior health services.

Many communities indicated that their shelters would benefit from an increase in case management services. Funds provided during the pandemic have allowed for staffing increases. However, it is important to maintain and increase the current staffing levels in order to address underlying issues causing persons to experience homelessness as well as connect them with housing opportunities.

There is a need for immediate placement into permanent housing throughout the state. Subsidized housing and housing authorities have waiting lists. The housing inventory that is filled from the Coordinated Entry list does not have adequate supply to meet the need. Lack of landlords who are willing to work with housing programs on a level that would meet our unmet needs. This is the primary need as identified by partner agencies, stakeholder groups and Continuum of Care organizations.

At times, people experiencing homelessness are unable to care for themselves and are in need of a higher level of care through assisted living or a nursing home. Wisconsin needs more connections to these resources. These facilities need to exist for people with criminal backgrounds and those with substance use disorders. It can be very difficult to connect people in these situations to long-term care options.

Currently Housed Populations at Risk of Homelessness/Other Families Requiring Services or Housing Assistance to Prevent Homelessness

The State of Wisconsin works to prevent homelessness whenever possible; however, the State often lacks the necessary resources to accomplish this goal. Frequently, tenants are in need of assistance in communicating and negotiating with landlords. Some issues could be resolved with problem-solving conversations. There is a need for legal assistance. Tenants may find themselves facing eviction, but aren't certain of their rights. When they go to court, they may face the prospect of dealing with the property owner's attorney; however, they don't have anyone to represent their needs.

Experiences shared by partner agencies, Continuum of Care and stakeholder groups demonstrates a need for housing assistance for those in housing but at risk of homelessness. Specifically identified are rentals that are “affordable”; three bedroom and larger units, handicap-accessible units, one-bedroom units; two-bedroom units. Permanent supportive housing opportunities are needed for singles as well as families with children. Additional housing vouchers, including tenant-based rental assistance, to move people from shelter into housing, with ongoing case management are critical to maintain persons in housing.

Much of the funding for housing programs requires that someone experience homelessness in order to meet eligibility requirements; however, it is much less traumatic as well as more cost effective to maintain housing. Funding for case management and rental assistance for households who are in housing, but at-risk of losing it are important. Interventions must start prior to entry into homelessness. There is a need for truly affordable housing in our community. Many households are struggling to pay rent because costs are very high and incomes are low.

For those that may need assistance in locating new housing, there is an increased need for housing navigation and housing location services. People need assistance in navigating the application and leasing process. There is also a need for staff who recruit landlords and build and maintain those relationships. Community member seeking new housing often have many financial needs that arise that our community does not have adequate resources for. Types of costs include: application fees, security deposits, first month’s rent, moving costs, and storage fees.

Additionally, households may need assistance in increasing their income. Forging connections between employment and training programs that can meet the needs of people in unstable housing situations are needed. Additionally, benefits specialists who are knowledgeable on mainstream benefits and the social security process are needed to ensure people are connected to all resources for which they are eligible and want.

There needs to be increased access to homeownership opportunities. Often, households are looking to purchase homes, but are uncertain of the steps needed to achieve this goal. Currently, staff are so focused on the immediate crisis that long term planning needed for homeownership doesn’t always happen.

Unstable housing can be the result of behavioral or physical health concerns that are not adequately treated. Households need to have easy access to these services. At times, this may mean the services must come into the home.

The Wisconsin Department of Veterans Affairs’, Veterans Housing and Recovery Program (VHRP) provides transitional housing and clinical housing to up to 105 eligible veterans per night. These TH facilities consist of shared living spaces located in three communities: Chippewa Falls (48), Green Bay (17), and Union Grove (40). With 127 beds allocated for veterans at various shelters across the state, this indicates a shortage of 164 beds for homeless veterans.

The rate of recidivism for WDVA housing programs is 7.63%, which is higher than the aggregate recidivism of all housing programs reported to HMIS. The majority of WDVA housing programs consist of Transitional Housing (89.8%) with a recidivism rate of 8.5% compared to the Balance of State TH recidivism rate of 4.7%.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

Low-income households at risk of homelessness are often experiencing both a housing cost burden as well as a myriad of co-occurring issues that make it difficult to maintain housing stability. Individuals and families at risk of homelessness often lack a stable source of income or may have recently suffered a loss of income. Issues such as a lack of transportation to and from work (especially in rural areas) and a lack of childcare make it difficult to maintain a job. In some circumstances, those at risk of homelessness have mental illnesses or other disabilities that make it difficult to find both employment and safe, accessible, and affordable housing.

Families nearing the end of rapid re-housing assistance need sufficient income in order to afford rent after the rental subsidies end. Typical difficulties experienced include long waits for Social Security Income approvals, struggles with finding better-paying jobs, and living dependent on Temporary Assistance to Needy Families (TANF) funding. In addition, homeless providers have expressed that the loss of case management services experienced at the same time as the loss of rental subsidy can cause some families to struggle with financial management and day to day activities, leading to a crisis situation. Providers continue to focus on finding sufficient income for families during the program so that they can maintain housing stability after its end.

The State of Wisconsin Department of Administration, Division of Energy, Housing and Community Resources has a variety of resources available to assist qualifying populations. The State administers Community Development Block Grant (CDBG), HOME Investment Partnership, Emergency Solutions Grants, Housing Opportunities for Persons with AIDS and Housing Trust Fund allocations. The State allocates Temporary Assistance to Needy Families (TANF) funding to provide case management resources to persons experiencing homelessness. Additionally, the State allocates General Fund dollars to supplement supportive services and shelter programs on an annual basis.

In program year 2020-2021 the State committed funds as shown in the following table:

Program	Funding Source	Funding Amount
Housing Rehabilitation	CDBG, HOME, HTF, Program Income	\$31,497,431
Housing Development	HTF, HOME, Program Income	\$15,657,103
TBRA	HOME, HOPWA	\$5,957,225
Prevention, Supportive Services, Shelter Operations	ESG, TANF, General Fund, Program Revenue	\$9,875,666
Total:		\$62,987,425

The **State of Wisconsin, Department of Veterans Affairs (WDVA)** also provides resources. Funded largely by the USDVA Grant and Per Diem (GPD) program, the WDVA VHRP currently maintains 105 transitional housing beds located at three facilities across the state. In Chippewa Falls the VHRP is located in Klein Hall on the Wisconsin Department of Health Services (DHS) campus of Northern Center and provides 48

beds. The current configuration of the living space in Klein Hall consists of six (6) different suites composed of single-person, double-person, and triple-person rooms able to house eight (8) veterans per suite. None of the GPD rooms provide individual bathrooms or showers and everyone must share a communal bathroom with 8 people and a communal shower room with up to 16 people.

The Union Grove VHRP is located at Fairchild Hall on the Wisconsin DHS Southern Center Campus in Union Grove and provides 40 beds. The configuration of the facility currently consists of three wings, two that house 18 veterans each in double bedrooms with a shared bathroom. The third wing houses four (4) beds housed within two double bedrooms with shared bathrooms.

The Green Bay VHRP is in a public residential neighborhood and provides 17 beds. These beds are within single bedrooms with communal bathrooms and a communal shower room. This facility is rented by WDVA. Emergency Shelter can be provided to homeless veterans using a motel voucher program while the federal HUD-VASH program provides permanent supportive housing to Veterans.

The **State of Wisconsin, Department of Children and Families (DCF)** administers funds intended to support Runaway and Homeless Youth (RHY) ages 12-21 who have run away, or are at-risk of running away, are homeless, or are at imminent risk of becoming homeless. RHY services are provided through contracts awarded regionally, with 14 of Wisconsin's 72 counties using state-funded RHY programs - <https://dcf.wisconsin.gov/rhy>. Programs are required to have an emergency shelter option available for youth under 18 and have the option to serve only a subset of the 12-21 age range (for example, youth between the ages of 12-18). Funds may also be used to pay or leverage costs of providing services to both sheltered and unsheltered youth including, but not limited to, outreach, drop-in centers, transitional or permanent housing, case management, crisis counseling and mediation, transportation, education and employment support, and/or family preservation services. State RHY funding contributes to roughly 40 shelter beds available for youth experiencing homelessness, with all but six being in Southern Wisconsin. In addition, RHY programs offer numerous community presentations, tangible goods, hours of street outreach, 24/7 RHY hotlines, and family mediation whenever possible.

In alignment with federal Family First Prevention Services Act, the Department of Children and Families, in partnership with state's local child protective service (CPS) agencies, has been shifting its CPS response from removing children who are identified to be unsafe from their caregivers to serving these children and their caregivers in the family home.

Overall services provided to this in-home population include a range of supports intended to stabilize the family as identified by county child welfare agencies. One key resource is the Targeted Safety Services (TSS) program. Local CPS and tribal agencies receive TSS to provide direct support to families where a child has been identified to be at imminent risk of removal from their homes. Tribal and county agencies continue to cite housing instability as a major barrier and housing supports as a critical need to ensure child safety.

DCF is initiating a partnership with Casey Family programs and anticipates funding to support a small number of local housing demonstration projects to support local innovative efforts to provide housing and supports to families in the child welfare system at risk of homelessness.

The DCF "Emergency Assistance" (EA) program is funded by the Temporary Assistance to Needy Families (TANF) - <https://dcf.wisconsin.gov/ea> - to serve low-income Wisconsin families experiencing a current emergency due to fire, flood or other natural disaster, an energy crisis, impending homelessness, or

homelessness by providing cash payments that are based on family size and personal situation (e.g., \$516 for families of four or fewer, \$110 per family member for families of six or more) one time annually. Assistance may be used to pay charges related but not limited to rent, utilities, and housing deposits. Cash funding is typically provided directly to the requesting entity (e.g., the utility company) rather than the applicant. EA applicants must meet certain financial and non-financial eligibility criteria. Financial eligibility for the program includes a combined total EA Group income that must be at or below 115% of the Federal Poverty Level and assets valued at \$2,500 or less.

Finally, DCF supports program services and shelter for victims of domestic violence - <https://dcf.wisconsin.gov/domesticabuse>. Domestic Violence Housing First is an evidence-based and trauma-informed program that moved survivors into safe, stable permanent housing as quickly as possible. Once housed, survivors have access to supportive, holistic advocacy resources to rebuild their lives. DCF has invested \$2,049,484 in American Rescue Plan Act funds that were allocated to Wisconsin through the Family Violence Prevention and Services supplemental funding processes to support the development of DVHF sites in four (4) communities.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The key gaps within the State of Wisconsin's housing inventory primarily include a lack of affordable housing units and an access to available services to keep households in their housing. Overwhelmingly, key stakeholders, partners and constituents requested additional funding for communities to develop opportunities for housing with supports and to provide funding for additional sheltering options with case management supports.

Key indicators of these gaps include: long waiting lists for permanent housing, landlords raising rent, families who are doubled up, landlords who are unwilling to work with prevention programs, sub-standard housing (housing that is unhealthy or in need of repair) and housing that is not close to work, other amenities or on bus line. In addition, stakeholders report an acute lack of housing for those who are on the sex offender registry, those who are convicted of manufacture of illegal substances and victims of domestic violence.

Many households lack access to services including legal support for low-income households, lack of a local Tenant Resource Center. Research indicates that about one of five low-income persons has a critical civil legal problem (that may lead to housing instability, as described above) at any point in time.

Therefore, approximately 104,000 persons may have a need for a civil legal aid lawyer at any given point in time.

Accessing health care in communities continues to be a challenge. Lack of staffing in mental health programs, leading to delays in completing intakes for people in need is important. Lack of substance abuse treatment services, both in patient and out-patient are important needs throughout the state.

The Wisconsin Department of Children and Families identified several gaps in the programs administered by the Agency. Even prior to the onset of the current public health emergency, local Child Protective Service (CPS) agency leaders and other key stakeholder identified service gaps as lack of access to affordable housing and housing instability as a significant factor affecting child safety and a local CPS agency's ability to serve a child in his or her family home.

A survey to local CPS agency direct service and management professionals regarding in-home CPS service provision to children and families in 2019, almost two thirds of the respondents identified that resources and supports were needed for over half of the families they served during that period.

Identified service gaps in Emergency Assistance (EA) include state and federal administrative and regulatory barriers to accessing the program as well as program limitations related to overlooked populations and specific program features.

Overlooked populations include: foster care youth aging out; non-custodial parents; domestic violence survivors who do not fit the current EA program definition of domestic violence; renters behind on rent who have not been served with eviction notices; renters with eviction notices not experiencing a concurrent “financial crisis”; applicants without a minor child (e.g., the elderly); applicants without a Social Security number or who don’t meet immigration status eligibility requirements; and, individuals residing with others (friends/family) for more than 180 days.

EA program features that provide challenges to participation are: an inability to apply for EA within 12 months of previously receiving EA (particularly challenging for domestic violence survivors who may experience multiple emergencies during a 12-month period), insufficient funding to meet family needs; and, income restrictions (e.g., families exceeding \$115% of the federal poverty level).

Victims and survivors of domestic violence are at significant risk of homelessness. It is estimated that more than 80% of survivors of domestic violence have made the choice to face homelessness for themselves and their children rather than stay in an unsafe, abusive relationship.

There were 13,864 requests for shelter that went unfulfilled in FFY 21 due to a shelter being full.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

Not applicable. The State does not plan to formally adopt a definition of “other populations”.

Identify priority needs for qualifying populations:

The priority needs for the qualifying populations in the State of Wisconsin include providing HOME ARP funds for acquisition, rehabilitation or construction of affordable housing, as well as supportive services to enable qualifying populations to obtain and maintain permanent housing. Based on feedback received during the consultation process the greatest priority should be given to the acquisition, rehabilitation or construction of affordable housing, especially for those persons experiencing homelessness.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The State of Wisconsin utilized data from the Point in Time Count, Housing Inventory Count, HMIS Comprehensive Housing Affordability Strategy, ACS as well as available stakeholder data from 2018-2020.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

DEHCR will solicit applications for funding through email notice to all HUD recognized Continua of Care, local homeless coalitions, the state association of Public Housing Authorities, the state association of Community Action Agencies, and current grantees. DEHCR will issue a Notice of Funding Availability (NOFA) on its website; application information will be available. Eligible activities will be administered by funded agencies. All qualifying populations are eligible to receive housing pursuant to these funds.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$8,606,448		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$27,108,716		
Non-Profit Operating	\$33,450	<1%	5%
Non-Profit Capacity Building	\$40,185	<1%	5%
Administration and Planning	\$6,315,670	15%	15%
Total HOME ARP Allocation	\$42,104,469		

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The majority of agencies providing services for housing and homelessness consistently report that they are unable to fully expend their funding for housing due to the shortage of housing units available for very low-income clients. By increasing the number of units available to low- or no-income clients of these agencies, the pressure on emergency shelters will ease. Increasing the number of units will have positive long-term impact on reducing the number of families and individuals experiencing homelessness. All qualifying populations are eligible to receive housing pursuant to these funds.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

116

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

Production of new affordable housing units. Among the entities and individuals consulted during this process, there was almost uniform consensus that the development of permanent affordable housing was the most pressing need; and that HOME-ARP funds should be used to produce housing which could serve Qualifying Populations. Wisconsin has had a longstanding shortage of affordable rental housing, and the COVID-19 pandemic has only exacerbated this problem. Production of more units specifically targeted to Qualifying Populations will directly address this situation.

Preferences

Regulatory Requirements

Section V.C.4 of the Notice states that PJs must identify whether they intend to establish a preference for one or more of the QPs or a subpopulation within one or more of the QPs for any eligible activity or project. If a PJ chooses to establish a preference, they must explain how the use of a preference or method of prioritization will address the unmet needs or gaps in benefits and services identified in the Needs Assessment and Gaps Analysis. PJs must also describe how they will still address the unmet needs or gaps of the other QPs that are not included in a preference through the use of HOME-ARP funds.

Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

While WI is facing a shortage of housing units and eligible supportive services among all HOME-ARP QPs, information from the consultation sessions, stakeholder survey, and quantitative data analysis indicate that there are greater needs for three of the four HOME-ARP populations. In accordance with these findings, projects may give preference to the following populations:

Preference #1: Individuals experiencing homelessness, as defined in 24 CFR 91.5.

Preference #2: Individuals at risk of homelessness, as defined in 24 CFR 91.5.

Preference #3: Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD.

These preferences will allow organizations to prioritize affordable housing and supportive services for these populations.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

These preferences will allow DEHCR to potentially prioritize access to housing and supportive services for those QPs with the greatest identified needs as identified in the housing data provided. Individuals and families in the three preferences are the most vulnerable and need deep subsidies and intensive supportive services to obtain and maintain permanent housing.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Members of the "Other" QP will still be able to apply for all HOME-ARP funded projects, including those that have stated preferences. Not all projects will choose to set preferences. While DEHCR may provide additional points in the application process for those projects that choose to serve the populations for which there is a preference, no project application will be excluded that intends to serve all Qualifying Populations. Additionally, all Qualifying populations may be referred to and apply for any HOME ARP project.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. A PJ may use multiple referral methods in its HOME-ARP program. (Optional)

DEHCR will require HOME-ARP-funded projects and services to use an expanded Coordinated Entry system for referral of all QPs. DEHCR will enter written agreements with the Balance of State Continuum of Care and the Racine Continuum of Care to utilize the existing CE system.

If the PJ intends to use the coordinated entry process established by the CoC, describe whether all QPs eligible for a project or activity will be included in the coordinated entry process, or the method by which all QPs eligible for the project or activity will be covered. (Optional)

All projects, whether or not a preference is established, will be required to utilize the expanded CE system to select individuals and families from the Qualifying Populations.

If the PJ intends to use the coordinated entry process established by the CoC, describe the method of prioritization to be used by the coordinated entry. (Optional)

Projects with preferences will select individuals and families from the expanded CE system using the prioritization process established by the Continuum of Care. For projects without preferences, individuals and families will be selected from the expanded CE system list established by the local housing coalition in consultation with the CoC for that project.

There will be no violation of fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a) when applying preferences through these referral methods. Persons who are eligible for a preference must have the opportunity to participate in all HOME-ARP activities of the PJ in which they are eligible under this Notice, including activities that are not separate or different, and cannot be excluded because of any protected characteristics or preferential status.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional)

N/A

Limitations in a HOME-ARP Rental Housing or Non-Congregate Shelter Project

Regulatory Requirements

The HUD Notice states that limiting eligibility for HOME-ARP rental housing or non-congregate shelter projects is only permitted under certain circumstances. For example, PJs may limit admission to HOME-ARP rental housing or non-congregate shelter projects to households who need specialized supportive services that are provided in such housing or non-congregate shelter. Any limitations must follow all applicable fair housing, civil rights, and nondiscrimination requirements.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or non-congregate shelter project to a particular QP or specific subpopulation of a QP identified in section IV.A of the Notice.

DEHCR will not be imposing limitations on any HOME ARP activity.

HOME-ARP Refinancing Guidelines

Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.

Not applicable as the State of Wisconsin does not intend to use HOME-ARP resources to refinance existing debt.

Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Not applicable as the State of Wisconsin does not intend to use HOME-ARP resources to refinance existing debt.

State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Not applicable as the State of Wisconsin does not intend to use HOME-ARP resources to refinance existing debt.

Specify the required compliance period, whether it is the minimum 15 years or longer.

Not applicable as the State of Wisconsin does not intend to use HOME-ARP resources to refinance existing debt.

State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Not applicable as the State of Wisconsin does not intend to use HOME-ARP resources to refinance existing debt.

Other requirements in the PJ's guidelines, if applicable:

Not applicable as the State of Wisconsin does not intend to use HOME-ARP resources to refinance existing debt.