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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

DEHCR

Division of Energy, Housing and Community Resources

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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 **Original Submission Date:** June 28, 2022
Substantial Amendment Public Hearing: July 23, 2025

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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

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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

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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

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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 or 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, Rhinelander, 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.

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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.

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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 - Winnebagoland 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

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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

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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

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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.

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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

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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.

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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

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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 Continnua 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.

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Experiences shared by partner agencies, Continnua 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 unites, 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%.

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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

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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

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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 is his or her family home.

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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 area 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

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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

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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.

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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 Continua 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.

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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.

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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.

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APPENDIX C: SUMMARY OF CITIZEN PARTICIPATION

Public Comment Period

1. Received 7/29/25 from Sheldon Johnson, Executive Director, Northwest Regional Planning Commission

Re: Substantial Amendment for receipt of $244,906 in HOME-ARP funding

Thank you for the opportunity to provide comment on the Substantial Amendment to the current HOME-ARP Allocation Plan. Upon review of the additional funds intended to be provided to the State of Wisconsin and the use of current and future funds targeting eligible recipients, this email is in support of the Substantial Amendment as proposed.

Division of Energy, Housing and Community Resources (DEHCR) Responses to Public Hearing Comments

	Commenter	DEHCR Response
1	Sheldon Johnson, Executive Director, Northwest Regional Planning Commission	DEHCR appreciates the support for and recognizes the importance of the additional funding from HUD to support the HOME-ARP program.

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OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424

*** 1. Type of Submission:**
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

*** 2. Type of Application:**
- [ ] New
- [ ] Continuation
- [x] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: Completed by Grants.gov upon submission.

4. Applicant Identifier: Department of Administration

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier: Home ARP Supplemental Funding

8. APPLICANT INFORMATION:

* a. Legal Name: Wisconsin Department of Administration-DEHCR

* b. Employer/Taxpayer Identification Number (EIN/TIN): 39-6028867

* c. Organizational DUNS: 8090357280000

d. Address:

* Street1: 101 East Wilson Street
Street2:
* City: Madison
County/Parish:
* State: Wisconsin
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 53707-7970

e. Organizational Unit:

Department Name: Department of Administration

Division Name: DEHCR

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.
* First Name: David
Middle Name:
* Last Name: Pawlisch
Suffix:

Title: DEHCR Administrator

Organizational Affiliation:

* Telephone Number: 608-266-7531
Fax Number: 608-266-5381

* Email: David.Pawlisch@wisconsin.gov

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Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program (14.239)

*** 12. Funding Opportunity Number:**

FR-6000-N-01

* Title:

HOME-ARP Supplemental Funding

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

HOMEInvestment Partnership (HOME) American Rescue Plan funding

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

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Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: All WI

* b. Program/Project: All WI

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 4/30/2025

* b. End Date: 4/29/2026

18. Estimated Funding ($):

* a. Federal	42,104,469
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	42,104,469

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on .
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	Ms.
* First Name:	Diana
Middle Name:	
* Last Name:	Maas
Suffix:	
* Title:	Asst Deputy Secretary, WI Department of Administration
* Telephone Number:	608-261-7010
Fax Number:	
* Email:	diana.maas@wisconsin.gov

* Signature of Authorized Representative: DocuSigned by: Diana Maas 38AE84A2D7344C3... Completed by Grants.gov upon submission.

* Date Signed: 9/1/2025 11:18 AM CDT Completed by Grants.gov upon submission.

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OMB Approval No. 0348-0040

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
DocuSigned by: Diane Maas 38AE84A2D7344C3...	Assistant Deputy Secretary
APPLICANT ORGANIZATION	DATE SUBMITTED
State of Wisconsin Department of Administration	August 25, 2025

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OMB Approval No. 0348-0042

ASSURANCES - CONSTRUCTION PROGRAMS

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property aquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.

4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.

5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.

6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
DocuSigned by: Diane Maas 38AE84A2D7344C3...	Assistant Deputy Secretary
APPLICANT ORGANIZATION	DATE SUBMITTED
Wisconsin Department of Administration	August 25, 2025

Docusign Envelope ID: 37B83BAB-471A-4D81-B0A8-1E9F0883D6C5

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose
accordingly.

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Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

DocuSigned by:
Diana Maas
38AE84A2D7344C3...
Signature of Authorized Official

9/15/2025 | 11:18 AM CDT
Date

Asst. Deputy Secretary
Title

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APPENDIX A: SUMMARY OF PUBLIC AND PRIVATE AGENCY PARTICIPATION

Balance of State CoC

- Responses from the CoC as a whole
- Responses from each of the twenty-one coalitions that cover our sixty-nine county service area
- Additional attachments provided by some coalitions
- CoC Data Report including:

o Point-in-Time

o Housing Inventory Chart

o HMIS Emergency Shelter Demographics 2021

o HMIS ESG CAPER Report 2020-2021

o HMIS HUD APR 2021

o Coordinated Entry data (homeless and prevention)

1. Describe the size and demographic composition of the qualifying populations residing within your organization's service area/boundaries.

- The WI Balance of State CoC covers 69 of Wisconsin's 72 counties extending from the shores of Lake Superior in the northwest to portions of the Chicago metro area in the southeast. The population within the CoC is over 3.8 million and covers an area of 52,533 square miles.
- See attached CoC Data Reports

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

a. Sheltered and unsheltered homeless populations:

b. Currently housed populations at risk of homelessness:

c. Other families requiring services or housing assistance or to prevent homelessness:

d. Those at greatest risk of housing instability or in unstable housing situations:

e. How can Division of Energy, Housing and Community Resources, utilizing HOME-ARPA funds assist in shortening the length of time this population is homeless?

- See attached coalition responses to:

(1) Describe the unmet housing and service needs for those experiencing homelessness or at-risk of homelessness. Please use data other than PIT, HIC, CE to answer this question. Identify what data source you did you.

(2) How can DEHCR, utilizing HOME-ARPA funds assist in shortening the length of time this population is homeless?

(1) Describe the unmet housing and service needs for those experiencing homelessness or at-risk of homelessness. Please use data other than PIT, HIC, CE to answer this question. Identify what data source you did you.

(2) How can DEHCR, utilizing HOME-ARPA funds assist in shortening the length of time this population is homeless?

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See attached CoC Data Reports

(3) 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.

- See attached coalition responses to:

(3) Does your coalition have TBRA projects or any other housing programs for people experiencing homelessness or at risk of homelessness that is NOT currently listed on the HIC? It doesn't matter what the funding source is for these projects. Please list them here – name and capacity.

- See attached CoC Data Reports

(4) Identify any gaps within the current shelter and housing inventory as well as the service delivery system.

- See attached coalition responses to:

(4) What are the gaps within the current shelter inventory?

(5) What are the gaps within the current housing program inventory?

(6) What are the gaps within the service delivery system?

(5) Identify the characteristics of housing associated with instability and an increased risk of homelessness.

a. How should the State define "other populations" for eligibility under HOME-ARPA?

- See attached coalition responses to:

(7) Identify the characteristics of housing associated with instability or that increase the risk of homelessness. This should be on the housing, not the people.

(8) How should the State define "other populations" for eligibly under HOME-ARPA?

(6) Identify priority needs for qualifying populations.

- See attached coalition responses to:

(9) What should the priority of needs for the qualifying populations be? Rank them.

7) Explain how the level of need, gaps in the shelter, housing inventory and service delivery systems were determined.

Responses were gathered from each local coalition, coordinated entry data, point-in-time and housing inventory chart data, and other identified sources contained within each coalition's response.

It is with the above data and analysis in mind that we recommend HOME-ARPA funds prioritize households without children and then those with children experiencing HUD category 1 and 4 homelessness. Those sleeping outside, in shelters, and fleeing or attempting to flee domestic violence should be prioritized to ensure safety and reduce the impact that homelessness has on a person/family.

Dane County CoC

December 3, 2021
To: Landon Williams, Division of Energy, Housing and Community Resources
From: Torrie Kopp Mueller, on behalf of the Dane County Continuum of Care
Re: State allocation plan for HOME funds

1. Describe the size and demographic composition of the qualifying populations residing within your organization's service area/boundaries.

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There are a variety of data points we can use to describe the size of the qualifying populations within Dane County. One is to look at the current shelter census. Below is a chart that provides information on current shelter availability and waitlists.

Shelter	**Capacity**	**Nightly average for Nov.**	**Waitlist**
Porchlight Men's Shelter	250	120	No waitlist
The Salvation Army – Family Shelter	35 families	34 families	4 Families – Category 1 homeless 42 Families – Doubled-up homeless
The Salvation Army Women's Shelter	65 beds in rooms, 45 bed overflow	72	No waitlist
Sankofa ELU Shelter	No response		
Domestic Abuse Intervention Services	40 family beds, 16 individual beds	No response	Always has a waitlist
Vulnerable Population Hotels	100 rooms (can accommodate 2 people in rooms as needed)		81 people

The school districts use the full HUD definition of homelessness including households who are doubled-up or self-paying at hotels. The numbers below reflect the number of students identified this school year. It does not include other household members or non-school aged children. Some of the students listed below, may also be reflected in the shelter numbers or on the Coordinated Entry Housing Priority list.

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School District	# of students identified as eligible for McKinney-Vento services this far in the 21-22 school year
Madison Metropolitan School District	620
Stoughton Area School District	24
Cambridge	10
Deerfield	12
Verona	44 (# much lower than other years)
Oregon	7
Middleton	40
Wisconsin Heights	10
Waunakee	28
Sun Prairie	108
McFarland	11
Monona Grove	21
Total	**935**

Coordinated Entry – Housing Priority List, December 3, 2021

	Total	Chronic	Youth, age 18-24	Veterans
Households with Children	128	23	24	0
Single Adults	663	304	50	43

2. **Describe the unmet housing and service needs of qualifying populations, including but not limited to:**
    a. **Sheltered and unsheltered homeless populations:**

The Madison/Dane CoC sees several housing and service needs for sheltered and unsheltered populations. Our community has shelter for households with minor children, single men and single women, but there is not a **shelter for couples or other adult only households**. Some of the people who remain unsheltered in our community do so because they do not want to separate from their household. Our community does not have **shelter for minors who are parenting**. The current **men's shelter** is a night-time only facility. A **24 hour facility** may better meet the need of men in our community in that they will not need to figure out transportation between facilities. The CoC currently has two family shelters, both always have a waiting list. This indicates an increased need for **emergency family shelter**. The pandemic has highlighted our need for **medical respite shelter**. There is

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currently medical shelter for those with COVID related needs. However, 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. There is a significant need for **behavioral health services**. In the 2021 Point in Time Count, 167* adults in emergency shelter indicated a mental health or substance use condition. On the same night 88* adults indicated a substance use condition.

The men's shelter would benefit from an **increase in case management services**. Funds provided during the pandemic have allowed for staffing increases at the men's shelter. It is important to maintain and increase the current staffing levels in order to really work on connecting men to housing opportunities.

There is a need for **immediate placement into housing**. Subsidized housing and housing authorities have waiting lists. The housing inventory that uses the Coordinated Entry list does not have adequate supply to meet the need.

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. Our community 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**.

*Adults were asked about mental health and substance use separately. Some may have indicated both conditions were true for them.

b. Currently housed populations at risk of homelessness:

Our community works to prevent homelessness whenever possible. The resources to do this do not always exist. Many times tenants are in need of assistance in **communication and negotiation 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 deal with the property owner's attorney, but they don't have anyone to represent their needs.

There is a huge need for housing assistance for those in housing. Much of the funding for housing programs requires that someone experience homelessness in order to meet eligibility requirements. There is a need for **case management and rental assistance** for households who are in housing, but at-risk of losing it. 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.

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These include: **application fees, security deposits, first month's rent, moving costs, and storage fees**.

Additionally, households may need assistance to increase their income. Increase connections to **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**. Many times 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.

c. Other families requiring services or housing assistance to prevent homelessness:

Please see the answer above. The interventions described there may also assist this population.

Some households may not enter the homeless services system, but could benefit from ongoing support. Development of **rapid rehousing programs to serve as homeless prevention** are needed in our community.

d. Those at greatest risk of housing instability or in unstable housing situations:

Please review the answer above as those services and housing assistance are needs that could benefit this population too. Additionally, those in unstable housing situations may benefit from **access to appropriate health care and behavioral health services**. Medical, mental health, and substance use conditions can contribute to unstable housing.

e. How can Division of Energy, Housing, and Community Resources, utilizing HOME-ARPA funds assist in shortening the length of time this population is homeless?

The following interventions could shorten the length of time that people remain homeless: creation of new truly affordable housing that people experiencing homelessness can access, increase use of rental subsidies, pathways to homeownership, acquisition of properties to be developed into permanent housing, funding to increase operations and services for permanent supportive housing, hiring staff to focus on landlord outreach and engagement.

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3. 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.

Please see the charts listed below for information for this information. At this time, the County has $148,473 in pre -2022 dollars committed to TBRA and anticipate committing another $70,832 under the 2022 allocation. The County has used American Rescue Act funds for the vulnerable population hotels and the Hotels 2 Housing program.

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

Gaps in shelter inventory

- Couples
- Parenting minors
- Medical shelter
- People with pets
- LGBTQ+
- Gender nonconforming
- Non-English speakers
- Those that will not use traditional congregate shelters
- Youth ages 18-24

Gaps in housing inventory

- Rapid rehousing for households who are doubled-up, self-paying in hotels or at-risk of homelessness
- Youth, both minors and those age 18-24
- Youth aging out of foster care
- People in Permanent Supportive Housing who are aging and struggling to continue with independent living

Gaps in service delivery

- Adequate levels of shelter case management
- Behavioral health resources
- Home ownership programming
- Funding for application fees, security deposit, first month's rent
- Housing navigation services
- Services for those at-risk of homelessness or in unstable housing
- Connections to long-term care options
- **Identify characteristics of housing associated with instability and an increased risk of homelessness**

Several characteristics are associated with instability and an increased risk of homelessness. These include: property owners not performing routine maintenance or adequately fixing maintenance issues, tenants who dealing with hoarding or are unable to provide regular cleaning/upkeep on the unit, regular rent increases, screening criteria that keeps people out of housing, increasing utility costs, gentrification

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that forces people into certain neighborhoods, lack of units for larger households, scattered vs. single site housing models.

a. How should the State define "other populations" for eligibility under HOME-ARPA?

Not certain what this means.

6. Identify priority needs for qualifying populations.

The highest priority is for affordable housing and specifically for populations that are most unlikely to be able to access conventional housing options (those on sex offender registry or other significant criminal history, untreated behavioral health, etc.). Housing and services that are focused on the needs of youth and young adults. Our community needs to analyze the mechanisms that are causing racial disparities in who is entering into the homeless services system.

7. Explain how the level of need, gaps in the shelter, housing inventory and servicedelivery systems were determined.

The information was obtained from discussions with the CoC Board of Directors, knowledge the CoC Coordinator as from attending meetings, Coordinated Entry data, Housing Inventory Count, Point in Time and Comprehensive Housing Affordability Strategy.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	400	147	471	471	0								
Transitional Housing	66	17	38	38	24								
Permanent Supportive Housing	426	127	462	462	232								
Rapid Rehousing	316	89	34	34	1								
Other Permanent Housing	274	73	330	330	0								
Sheltered Homeless						104 (PIT) 237 (Annual)	481 (PIT) 1,477 (Annual)	44 (PIT)	84 (PIT)				
Unsheltered Homeless						0 (PIT) 0 (Annual Est.)	78 (PIT) 240 (Annual Est.)	4	12				
Current Gap *										171	17	1,131	1,131

Data Sources: January 2021 Point in Time Count (PIT); FY20 Longitudinal Systems Analysis; September 2021 Continuum of Care Housing Inventory Count (HIC)

** Projected gap figures in the above table are derived from the following annual turnover rate assumptions: 100% (Emergency Shelter); 50% (Transitional Housing); 10% (Permanent Supportive Housing); 50% (Rapid Rehousing); 10% (Other Permanent Housing).*

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Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	**Level of Need**	**Gap Analysis**
	# of Units	# of Households	# of Households
Total Rental Units	61,696		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,020		
Rental Units Affordable to HH at 50% AMI (Other Populations)	17,350		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		11,995	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,320	
Current Gaps			0%-30% = 7,935 30%-50% = 0

Data Source: Comprehensive Housing Affordability Strategy (CHAS)

Legal Action

Describe the size and demographic composition of the qualifying populations residing within your organization's service area/boundaries: Legal Action of Wisconsin (Legal Action) provides legal services to low-income people in 39 counties in southern Wisconsin at no cost to the client. If you were to draw a line from Green Bay to La Crosse, Legal Action serves the Wisconsin counties south of that line. (Our colleagues at Wisconsin Judicare serve the Wisconsin counties north of that line. In addition, Wisconsin Judicare serves all the Native American tribes in the state.)
Legal Action handles the civil legal problems that are most common to low-income people: housing: family; public benefits; consumer; and barriers to employment. Each of these civil legal problems – even those that are not a "housing law" problem – often affects housing stability. We feel that this is the most misunderstood and underappreciated and undercalculated issue when it comes to understanding housing instability: A low-income person who has a problem with their public benefits, a consumer law matter, a barrier to employment (problems with drivers or occupational licensing), etc, and who cannot get a lawyer to help with that problem because they can't afford it, is as great of risk for homelessness and housing instability as a person with a "housing law" problem (is in eviction court, for example). Therefore, all low-income people in our service area who are experiencing a civil legal problem are a qualifying population. According to Census figures, about 520,000 low-income people reside in our service area.
Describe the unmet housing and service needs of qualifying populations: 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, we estimate that **104,000** persons **may have a need for a civil legal aid lawyer at any given point in time**. Because Legal Action is only one provider of civil legal services, we cannot quantify the total unmet need for the whole population. However, as a point of reference, Legal Action works on about 10,000 – 12,000 cases each **year** (not at a point in time) and Legal Action is the largest provider of legal services in the state. In other words, the unmet need is likely extreme.
How can Division of Energy, Housing and Community Resources, utilizing HOME-ARPA funds assist in shortening the length of time this population is homeless? Substantially increase funding for general civil legal aid – not specific to "housing law" problems, but for all those civil legal problems that cause housing instability.

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Identify priority needs for qualifying populations: Those civil legal problems and civil areas of law that directly and indirectly lead to housing instability: barriers to employment; family; consumer; public benefits; and housing.

Explain how the level of need, gaps in the shelter, housing inventory and service delivery systems were determined: Legal Action constantly examines our intake and calls/requests for service to identify emerging and long-term trends. In addition, we periodically formally assess the civil legal needs of low-income people regularly through surveys, interviews, focus groups, and trend and demographic analysis.

Department of Health Services

Responses from the Division of Medicaid Services

1. **Describe the size and demographic composition of the qualifying populations residing within your organization's service area/boundaries.**
   Previously, it is difficult to identify Medicaid members that may be homeless as we do not have a consistent way of documenting this. However, there are three analyses that we have conducted using Medicaid's enrollment files, claims data, and through an HMIS data exchange to define a baseline of who may be experiencing homelessness:
   1) Using the diagnosis code Z59.0 that is reserved for homelessness: in 2018 there **were 4,141** Medicaid members identified.[1]
   2) Using Income Maintenance (IM) address data: Individuals that are active Medicaid members on or after January 1st of 2019, there were **4,713** that has an IM agency addressed listed as their home address [2]
   3) Based on a data match conducted in 2019 between DMS and the Homeless Management Information System (HMIS), **6,929** unique Medicaid members were identified in the HMIS in the previous year – i.e. they accessed homeless services

   Through further analysis of the HMIS data match, the following was discovered:
   - 3,400 members utilized the Emergency Department (ED) with more than 25,000 visits collectively;
   - Approximately 60% of all individuals had a mental health condition and/or substance use disorder;
   - Over 1,000 members had an inpatient hospital stay totaling almost $17 million dollars collectively; and
   - Over 200 members gave birth during this time.

   It is also critical to note that African Americans represented 38% of the HMIS Medicaid population, whereas only 17% of African Americans make up the entire Wisconsin Medicaid population and 8% of the State's total population – highlighting and confirming the deeply rooted racial inequities in the housing system.
2. **Describe the unmet housing and service needs of qualifying populations, including but not limited to:**
   a. Sheltered and unsheltered homeless populations:
   b. Currently housed populations at risk of homelessness:
   c. Other families requiring services or housing assistance or to prevent homelessness:

[1] There are weaknesses to this method as providers are not required to use this and the Department does not know how providers are screening for this code.

[2] When IM agencies are enrolling individuals into Medicaid the member does not have an address, the IM agency will use the agency's address.

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d. Those at greatest risk of housing instability or in unstable housing situations:

e. How can Division of Energy, Housing and Community Resources, utilizing HOME-ARPA funds assist in shortening the length of time this population is homeless?

- Medicaid will be covering supportive housing services starting in 2022 through two different initiatives. Both will include housing navigation and case management for members experiencing homelessness. However, per Medicaid regulation, Medicaid cannot pay for room and board. Therefore, although services will be available to qualifying Medicaid members, there will likely still be a need for rental assistance once housed. Therefore, TBRA vouchers can be paired with Medicaid members accessing this new Medicaid supportive housing benefit, this will lessen the probability of a member being unstably housed. There are similar models in Arizona, Michigan, and Connecticut that DHS and DOA could replicate for implementation. Finally, CoC member agencies will be the Medicaid provider for this new Medicaid benefit. If TBRA vouchers can be paired with the Medicaid benefit, this could incentivize more CoC member agencies to enroll as Medicaid providers and therefore improving access to supportive services for Medicaid members.
- People experiencing homelessness are more likely to access the emergency room and to be re-hospitalized, both of which can be prevented through access to medical respite.[3] If the HOME-ARPA funds can consider medical respite as "supportive services" then this could help people recover appropriately from their condition and also provide them a short-term sleeping arrangement. If housing navigators know that someone they are trying to serve will be located in one place like a medical respite center, then they can spend more time working directly with that person vs. trying to locate them.

3. 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.

There are not resources available yet directly through Medicaid. However, approximately five Medicaid health plans pay for housing costs and supportive services for their members in Milwaukee.

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

The main gap within Medicaid is the lack of knowledge and awareness of how Medicaid members can access the homeless service system, including coordinated entry. Furthermore, there is not a centralized resource center for health care providers to access online that informs them of how to connect members to resources.

5. Identify the characteristics of housing associated with instability and an increased risk of homelessness.

a. How should the State define "other populations" for eligibility under HOME-ARPA?

No comment.

6. Identify priority needs for qualifying populations.

No comment

7. Explain how the level of need, gaps in the shelter, housing inventory and service delivery systems were determined.

Needs were determined through previously mentioned data analysis and stakeholder feedback collected over several years.

[3] Medical respite is acute and post-acute care for persons experiencing homelessness who are too ill or frail to recover from a physical illness or injury on the streets but are not ill enough to be in a hospital.

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Additional feedback from the Division of Public Health for approaching plan development with an equity perspective

- Ensure a diverse set of data sources are used to evaluate the need. Very often standard sources of data do not capture the full need. For instance, school district data tends to be more complete in terms of transient youth and children.
- Include considerations related to additional barriers where they exist (multiple compounding vulnerabilities) in the assessment. These might include the following:
    - Immigration status
    - Language needs
    - Disabilities
    - Domestic violence services
- Use people first language (e.g., people who are experiencing homelessness)

End Abuse Wisconsin

DECHR HOME ARP Funds Request - End Domestic Abuse Wisconsin

1 December 2021

In response to your request for data and policy insight regarding survivors of domestic violence experiencing housing insecurity or homelessness, we have compiled the below information. End Domestic Abuse Wisconsin (EDAW) is the Wisconsin coalition against domestic violence, which includes 73 member programs from counties and tribal nations across the state. This recommendation includes qualitative research from a variety of national and state-specific resources, and quantitative data provided by End Domestic Abuse Wisconsin's member programs regarding their direct service clientele. In November 2021, End Abuse staff surveyed the 73 DV programs regarding this HOME ARP funds request, including questions about survivor beds, income, unmet shelter needs, and recommendations. A sample of 27 programs throughout the state supplied data in this short response timeframe.

According to the Wisconsin Department of Children and Families, domestic violence programs served **39,247 survivors** and their children between October 2019 and September 2020, of whom **5,722 received shelter services**. More concerning, DCF also reports that there were **20,682 unmet requests for shelter** during that same time. As part of its annual survivor census, the National Network to End Domestic Violence reported that *on just one day in 2020*, 576 victims of domestic violence found refuge in emergency shelters, transitional housing, or other DV program housing services across Wisconsin. On that same day, 234 survivors requested services whose needs could not be met, given current resources – and 88% of those requests were for shelter and housing.

Of the 39,247 survivors served in Wisconsin from October 1, 2019 – September 30, 2020:

- **86% were women, 11% were men, and 3% did not specify gender.**
- **BIPOC families were disproportionately impacted.** Though Black or African American Wisconsinites make up 7.7% of our state census, 22% of domestic violence survivors served identified as such. While our state's Indigenous population is reported to be 2.5% of our communities, 5% of survivors served by programs were American Indian or Alaska Native.

According to our point-in-time November 2021 survey results, **27 of 73 programs reported:**

- 537 emergency shelter beds
- 63 transitional housing beds

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- 20 permanent supportive housing beds
- 135 families (at least one child) and 96 single adults currently housed in a shelter or a hotel paid for by the program
- 69 families and 29 single adults currently on a waitlist for shelter services
- 677 unmet requests* for an emergency bed between January and October of 2021
  *either because the program did not have available space or they had no shelter at all
- 1,627 survivors who rent their homes
- 3,732 survivors served between January and October of 2021 had a household income of 0-30% of the annual median income ($0-$19,250 a year).

We think it is important to reiterate that only 37% of programs were able to respond to the survey, and that data tracking requirements for domestic and sexual violence programs are often very different and much more limited in comparison to those of other traditional housing systems. Programs across the state are also very differently-resourced, and the services they offer are limited to their available funds,

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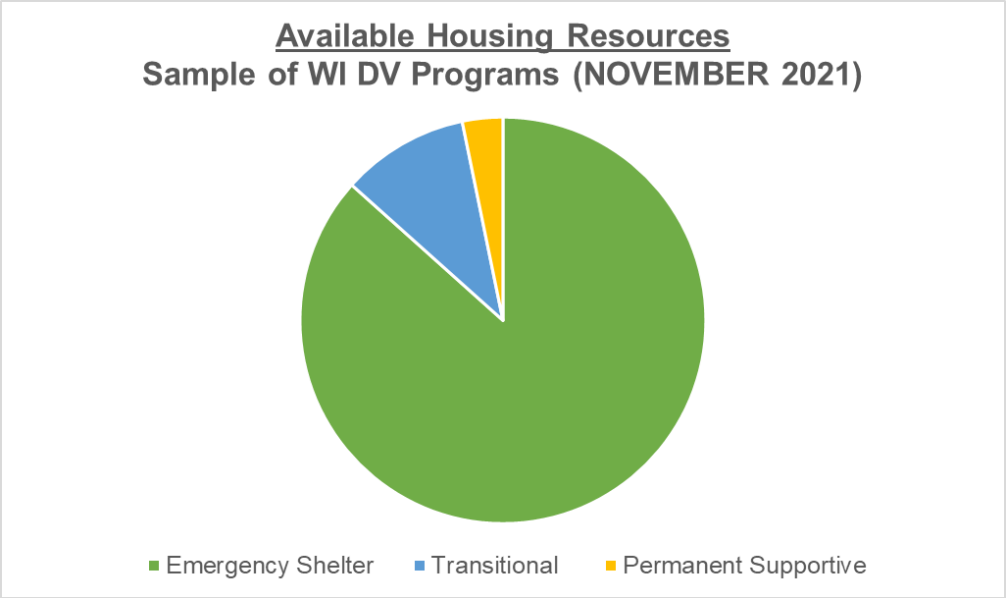
including whether or not they operate a shelter or a waitlist. Unfortunately, programs with fewer resources often serve communities with higher economic inequity and less economic investment, resulting in a disproportionate lack of safe, affordable housing.. The data above reflects how DV programs' housing resources are funded differently. Shelter beds are the most common housing resource among those programs surveyed. We know that shelter is critical for many DV survivors, but it does not meet every survivor's unique needs. A diverse array of housing options is necessary to ensure all survivors' needs are met. Among programs surveyed, only ten percent of available beds were in transitional housing and only three percent were in permanent housing. This continues to be a significant area of need throughout Wisconsin.



Though Wisconsin DV programs do not systematically or uniformly track quantitative data regarding risk of homelessness for their clients, advocates and research both indicate that domestic violence in and of itself is a risk factor for housing insecurity. Nationwide, 57% of survivors indicate their experience of domestic violence directly led to their homelessness, and at least 80% of women and children who have experienced housing insecurity also have a history of domestic or sexual violence during their lifetimes. Economic insecurity has only been exacerbated by the financial impacts of COVID-19, which has also increased the number of Wisconsin families experiencing domestic violence *and* negatively impacted survivors' ability to seek help from domestic violence programs.

When we know that financial abuse is one of the most common forms of domestic violence, and wealth and income inequality continue to harm economic mobility for BIPOC communities in our state, we must reckon with the disproportionate and compounding vulnerabilities to homelessness and domestic violence that BIPOC survivors face, especially Black and Indigenous women and their children. Because of grant and funder requirements, programs also often struggle to fund services for survivors who are also specifically vulnerable to housing insecurity because of other identities, including:

- Young people between the ages of 16-25, especially those in the 2SLGBTQIA+ community, those who have justice-system involvement, and those who are in or have recently aged out of foster care
- Survivors who been labor or sex trafficked, especially those who have been criminalized as part of their trafficking

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- Undocumented survivors or those with mixed-status families
- Elders experiencing abuse, especially those with compounding vulnerabilities associated with chronic disabilities and AODA or mental health concerns

Existing housing systems often fail to serve survivors' specific and trauma-informed needs, and do not adequately assess their vulnerability as it relates to potentially lethal domestic and sexual violence. In the fall of 2020, End Domestic Abuse Wisconsin staff partnered with the Wisconsin Balance of State to assess gaps and challenges that domestic violence programs identified in connecting their clients with the Coordinated Entry system across WIBOSCOC coalition programs. DV providers indicated:

- Unfunded administrative burdens for DV/SA staff create barriers to participation in both RRH and CE systems; in conjunction with long wait times and invasive assessment process, this also severely decreases the benefit or willingness to participate and/or accept future HUDfunds
- Direct service providers report they and their clients feel the VISPDAT assessment is invasive, non- trauma informed, and does not adequately capture trauma history or current safety crises
- Difficulty accessing and/or maintaining non-HMIS lists prevents timely and effective follow-ups and (re)prioritization of survivors

The Wisconsin Department of Children and Families recently announced they would be funding a series of four Domestic Violence Housing First pilot sites, with a budget of just over $570,000. As exciting as this news was for the programs who received the funds, another **17 programs** applied for and did not receive funding. If all 21 sites were to be funded, the estimated total cost would be **$4,020,000**. As part of our November 2021 survey, we also requested feedback from programs regarding how the HOME-ARPA funds could assist in shortening the time survivors might spend homeless. Programs reiterated a desire for DVHF models, and had many specific ideas, including:

- first month's rent and/or security deposit payments
- short or long-term rental assistance programs
- flexible financial assistance for utilities payments, eviction judgments, lock changes, and moving expenses
- incentives for landlords to rent to survivors of domestic/sexual violence and human trafficking, especially those who may have eviction or criminal records that are connected to their trauma histories
- living-wage funding for staff specializing in housing navigation, case management, and transitional and supportive housing services
- overall investment in affordable housing opportunities that are accessible andsurvivor-friendly

It is with the above data and analysis in mind that we recommend HOME-ARPA funds prioritize vulnerable domestic violence survivors and their children.

Jenna Gormal, Dir. of Public Policy and Systems Change Sara Krall,
Homicide Prevention Program Director
Adrienne Roach, Grants Manager Tegan
Swanson, Systems Change Coordinator

Department of Veterans Affairs

Date: December 1, 2021

To: Landon Williams, Division of Energy, Housing and Community Resource, Department ofAdministration, via email: *Landont.Williams@wisconsin.gov*

Cc: Mary Kolar, Secretary, Department of Veterans Affairs

From: Donald Placidi, Administrator, Division of Veterans Benefits

Subject: State of Wisconsin Allocation Plan – HOME Investment Partnership Program

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The Wisconsin Department of Veterans Affairs requests $5,675,000 to support the Veterans Housing and Recovery Program (VHRP) capital improvement projects as a component of Wisconsin's allocation plan of federal HOME Investment Partnerships Program (HOME) funds provided pursuant to the American Rescue Plan Act of 2021 (ARPA).

Size and Demographic of WDVA program qualifying populations

WDVA programs aid Wisconsin veterans who meet the minimum qualifications established in Wisconsin Statutes, Chapter 45. According to 2018 the U.S. Department of Veterans Affairs (USDVA) estimates, 342,823 Wisconsin residents are veterans.[1] In 2019, 21,632 individuals experienced homelessness and received services from Wisconsin HMIS[2] agencies, which provide Emergency Shelter (ES), Transitional Housing (TH), Permanent Supportive Housing (PSH), Rapid Re-Housing, and Projects for Assistance in Transition from Homelessness (PATH) /Emergency Shelter Grant (ESG), and City-funded Street outreach. An estimated 10% of those individuals experiencing homelessness in Wisconsin are classified as veterans meaning roughly 2,100 Veterans experienced homelessness in Wisconsin during 2019.[3]

Overall, veterans have a lower rate of experiencing poverty than non-veterans, however USDVA estimates the rate of veterans experiencing poverty in Wisconsin is between 6.5 and 7.7%, meaning an estimated 22,283 to 26,397 have incomes less than the federal poverty threshold.[4] These veterans are at greatest risk of experiencing housing instability and are most often eligible for the assistance programs administered by WDVA.

WDVA programs are designed for the benefit of the 342,823 Wisconsin resident veterans and target the 22,283-26,397 Veterans with incomes below the federal poverty threshold. Of those resident veterans, approximately 2,100 experience homelessness for at least one night each year. Point-in-Time estimates indicate that on a single night in January 2019 there were 396 homeless veterans in the state.[5]

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[1] US Dept. of Veterans Affairs. (2018). *County-Level Veteran Population by State, Age group, Gender, 2018-2048.* Washington, DC: USDVA.

[2] Homeless Management Information System.

[3] Homeless Management Information System (HMIS), 2020.

[4] USDVA. (2015). *Veteran Poverty Trends.* Washington, DC: National Center for Veterans Analysis and Statistics.

[5] Institute for Community Alliances. (2020). *Point In Time Count Data for 2013-2019.* ICAlliances.

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Unmet Housing and Service Needs of Qualifying Populations

WDVA's 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%.

An expenditure of HOME/ARPA funds as requested will improve the quality of WDVA's available housing to reduce the length of time Wisconsin veterans are homeless and reduce the recidivism rate of WDVA housing programs.

The WDVA's VHRP is seeking additional funding for the purchase of improved facilities that will increase housing capacity and provide individual living space for Wisconsin's homeless veterans. Providing individual living quarters to program participants is critical to decreasing the recidivism rate by reducing the number of premature exits by veterans seeking privacy and increased security before attaining the requisite level of preparation for sustained self-sufficiency.

A complementary program administered by the WDVA, the Veterans Outreach and Recovery Program (VORP) works closely with veterans residing at the VHRP to provide supplemental wrap-around services, particularly as veterans prepare to graduate (exit) the VHRP. By ensuring that veterans complete their VHRP programming and prepare for exit by working with VORP staff, this too will help reduce recidivism. The VHRP also provided additional resources available to veterans through partnerships with the county and tribal veterans service offices, veteran service organizations, and USDVA. These programs and partnerships are not integrated with other housing programs available to the homeless population as they are with WDVA programs. For this reason, WDVA programs can provide the highest level of care to veterans experiencing homelessness.

Current Resources Available to Wisconsin Homeless Veterans

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) campusof 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.

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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.

How HOME/ARPA funds can assist Wisconsin's homeless veteran population

Funding from HOME/ARPA would enable WDVA to potentially expand facilities to provide housing to a greater number of Wisconsin's homeless veterans. The purchase and renovation of the facilities is expected to be completed by October

2023, at which time WDVA would have the capability to apply for additional GPD beds to close the gap of lack of beds in Wisconsin.

USDVA has provided additional funds so that programs like VHRP can transition away from congregate living in favor of individual living environments to improve residents' overall health, security, and overall wellbeing. In order to remain competitive for future USDVA GPD funding, WDVA should therefore preferably eliminate all congregate and communal environments in it VHRPs. Furthermore, our VHRPs are seeing an increased need for individual living spaces to appropriately serve our increasingly diverse and underserved veterans' populations. Creating a more attractive option for Wisconsin's homeless veterans will further reduce the strain on other community resources. Improved services would also reduce the utilization of the higher cost emergency shelter hotel vouchers.

Currently all WDVA's VHRPs are comprised of congregate living units. WDVA has been awarded two USDVA GPD capital grants to eliminate congregate living spaces, but the grants are insufficient to meet the associated expense. Via this request for HOME/ARPA funds, WDVA is seeking the additional funds necessary for: (1) purchase and renovation of a larger facility in Green Bay that will result in adding 10 beds (total of 27); (2) renovation of the Union Grove facility to provide 30 individual bedrooms with individual bathrooms; and (3) purchase and renovation of a new facility in Chippewa Falls to provide 48 individual bedrooms with individual bathrooms.

High cost of current facilities

WDVA currently pays high monthly costs to maintain its three facilities across the state.

The Green Bay facility cost the program $10,284.42 per month in rent and an additional $1,083.25 for utilities. The annual cost for Green Bay's 17 VHRP beds is $136,412.04, approximately $8,024.24 per bed.

The Union Grove at Fairchild Hall facility is owned and maintained by WDVA and has an estimated annual facility utility cost of $98,232.91 or roughly $2,455.82 per bed. Additionally, Union Grove, for the current fiscal year has spent an estimated $40,930 on maintenance costs and upkeep for the facility repairs due to age.

The Chippewa Falls facility at Klein Hall is located on the Department of Health Services Campus (Northern Center), which provides for a sharing of maintenance and utility costs. For fiscal year 21the

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annual cost to the agency was $94,908, putting the annual cost per bed at approximately $1,977.25.

Current Grant Funding

In September 2021, USDVA awarded WDVA two grants to fund capital improvement projects for the three VHRP facilities. The grants are allocated for the maximum amount of $50,000 per bed, provided through two separate grant allocations. The grant for Chippewa Falls awards $2.4 million to purchase and renovate a facility to replace the existing 48 bed facility. The grant for Union Grove and Green Bay, both of which fall within the same USDVA VA region, provides $1.8 million for the renovation of the 17 beds at Green Bay, an additional 10 beds which will be transferredfrom Union Grove to Green Bay, and renovation of 9 beds at the Union Grove facility. These grant funds are intended to provide renovations and improvements for 84 of the existing 105 WDVA TH beds and result in no net increase of bed availability. Additionally, the grant applications were submitted in May of 2021, and construction and renovation costs have increased significantly during the interim period.

The funding necessary to provide adequate renovations to the existing quantity of available beds is $75,000 per bed. This creates a gap of $25,000 per bed. These costs are based on the current USDVA Capital Grant Notice of Funding Opportunity. Since WDVA was awarded the initial grant, the agency is not eligible for the second round of grants with increased funding.

Justification of Funds Requested

WDVA is requesting a total of $5.675 million in HOME/ARPA funding to supplement and support the purchase, renovation, and improvement of the facilities for the VHRP. The additional funding will allow WDVA to ensure the improvement of safety of the residents, provide needed privacy, and transition to a non-congregate setting as encouraged

by the USDVA. In the future, this will enable the agency to potentially provide additional beds for homeless veterans in Wisconsin.

If awarded, the Chippewa Falls and Green Bay facilities will be relocated and transition from a congregate living environment to an environment with individual rooms and bathrooms. This additional funding will cover purchase costs and any renovations needed to meet the needs of the program.

During the initial search for properties in the Chippewa Falls area, there was an opportunity to purchase a 66-bed facility at a purchase price of $2.275 million. In addition to the purchase price, there was an estimated renovation cost of
$650,000 to $700,000, which left a gap in available funds for the project. Any purchase suitable for the needs of the program is above our grant from the USDVA. As part of the grant requirement the agency is responsible for ensuring all buildings are up to current codes and ADA accessible. With the combination of the purchase price and cost of materials and construction, more funds are needed to move forward with the plan to purchase and renovate a new building. Due to the current costs and the gap in funding, WDVA is seeking an additional $25,000 per bed for this location for a total amount of $1.2 million.

In the Green Bay area, real estate has been proven to be very expensive and our current funding will not support a purchase to improve the facility and expand the program by 10 beds. The Green Bay location needs an expansion as the facility is consistently full and has a wait list. More available beds

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will allow the agency to fill a need and gap. The WDVA is requesting an additional $2.675 million to support the purchase and renovation of a new facility. Currently on the market is a 38-bed facility for $3.750 million as a purchase price. The Department of Administration Real Estate team was unable to locate any property with the current funding for the USDVA Capital Grant.

The Union Grove facility located at Fairchild Hall on the Southern Center Campus needs substantial repair and this updating. As noted above, this fiscal year alone WDVA has spent over $40,000 on maintenance for the facility with most of those costs associated with HVAC and plumbing. WDVA currently has debt service of $95,000 annually on the facility and with ongoing maintenance, we are seeing less money to operate the program on an annual basis. Under the current capital grant from USDVA, we are funded to renovate and update 9 rooms in a wing of the facility to dedicate the wing to homeless female veterans. The funding allows us to provide basic maintenance and upgrades. In addition to this, the building does need major updates and repairs which the funding does not allow. WDVA is seeking an additional
$225,000 for the 9 rooms to meet the needs of the female population and an additional, $1.575 million to address the remaining issues with the building and homeless veteran rooms.

This funding will enable the agency to provide adequate, safe and individual living space for the veterans in the program creating more successful outcomes.

The following chart outlines the request from the agency:

Facility/Location	**Current Funding (USDVA)**	**Additional Funding (HOME/ARPA)**	**Total Funding**
Chippewa Falls	48 Beds x $50,000 per bed = **$2,400,000**	48 Beds x $25,000 per bed = **$1,200,000**	48 Beds x $75,000 = **$3,600,000**
Union Grove 1	9 Beds x $50,000 per bed = **$450,000**	9 beds x $25,000 per bed = **$225,000**	9 Beds x $75,000 = **$675,000**
Union Grove 2	None	21 beds x $75,000 per bed = **$1,575,000**	21 beds x $75,000 = **$1,575,000**
Green Bay	27 beds x $50,000 per bed = **$1,350,000**	27 beds x $25,000 per bed = **$675,000** Requesting additional **$2,000,000**	27 beds x $75,000 = $2,025,000 + $2,000,000 = **$4,025,000**

Wisconsin Housing and Economic Development Authority

Wisconsin Housing and Economic Development Authority is the housing authority for the State of Wisconsin and operates the Housing Choice Voucher (HCV) program in all 72 counties. WHEDA has an HCV allocation of 3,077 vouchers including 166 Veterans Affairs Supportive Housing (VASH) vouchers, 20 Family Unification Program vouchers (FUP) in Washington County and 343 Emergency Housing Vouchers (EHV). WHEDA's portfolio also includes Tenant Protection Vouchers, RAD vouchers, Project-Based Vouchers and vouchers divested by other housing authorities.

As of November 2021, WHEDA has a waiting list of approximately 1,500 applicants. The average wait time for a voucher is 666 days.

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The majority of the participants on WHEDA's HCV program are female-headed families with children and/or elderly or disabled households and 78% of all households' income is from Social Security, SSI or General Assistance.

	Percentage			Amount
Receive Social Security/SSI	65%		Average Participant Portion of Rent	$ 330
Receive General Assistance	13%		Average Annual Income	$ 14,044
Receive Wages	17%		Average HAP (11/2021)	$ 470
Elderly/Disabled	54%			
Female Heads of Household with Children	32%			

WHEDA has partnered with the Balance of State Continuum of Care and the City/County of Racine Continuum of Care to issue Emergency Housing Vouchers to recently-homeless or homeless families. In addition to the EHV program, we are working with the State Bureau of Youth Services at DCF to establish relationships with Independent Living coordinators across Wisconsin to issue vouchers to youth aging out of foster care through FUP.

WHEDA also has 166 VASH vouchers that are allocated to four VAMCs across the state – Tomah, Minneapolis, Iron Mountain and Milwaukee. We work very closely with the case managers to get homeless veterans into housing.

There are several barriers to low-income families finding housing in this market:
One - Rents are too high. WHEDA has set our Payment Standards as high as possible (110% of the Fair Market Rents) across all 72 counties. We will also increase the Payment Standards to 120% as a reasonable accommodation for disabled families, if needed.
Two – Market saturation. Many HCV families have unfavorable credit scores, rental history or criminal records and landlords choose to select other applicants without these issues over vouchers holders. WHEDA does attempt to work with landlords and to emphasize the benefits of the program with limited success.
Three – Ineligible housing. WHEDA contracts with eight agencies across Wisconsin for the daily administration of the HCV program. A number of these contractors are Community Action Agencies that develop and own low-income housing. Due to the contracts with WHEDA, any units owned by the agencies are ineligible due to a conflict of interest. WHEDA has been working with the Milwaukee Field Office to waive the conflict of interest regulation but it is a very slow process. In the meantime, for example, five veterans in St Croix County (the highest cost county in Wisconsin), are not able to move into agency-owned housing with assistance.

Of course there are many other issues that can be discussed but these are what we consider the top three. Others are addressed as they are identified as housing is a complex and fluid issue.

Wisconsin Department of Corrections

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1. Describe the size and demographic composition of the qualifying populations residing within your organization's service area/boundaries.

As of September 30, 3021, there were 1,388 clients on DCC supervision that reported being homeless. Of those 1,388 homeless clients, 47 (3.4%) self-related having military experience.

DCC offers services to all of our Correctional Clients under supervision based on their needs.

DCC provides Short-Term Housing, Transitional Housing/Transitional Living Program, and Emergency Housing options to adult Correctional Clients who are experiencing a lack of housing in the community. All three housing options are time-limited housing options.

- **Emergency Housing (EH)** – Day to day accommodations at hotels/motels or boarding houses (<30-60 days).
- **Short Term Housing (STH)**– Year-round contracted housing beds with no site checks (60-90 days).
- **Transitional Housing (THS/TLP) –** Housing is provided in the form of one to two-bedroom apartment(s) or a facility with multiple single- or double-occupancy bedrooms with access to congregate living areas and shared kitchen. The contractor supplies all bedding, household supplies, food, and staff supervision via random on-site inspections. Offenders attend on-site program services as determined by their agent and are allowed to work if they have outside employment. **Criminogenic Factors Served: Residential Instability.**

During FY21: Total number of clients served in these programs is 2643. See the breakdown of this data, along with the average Length of Stay (LOS) for each program below.

FY 2021 – 12 months			
Program Participants*	**Total Clients**	**Average LOS**	**Total Days**
THS/TLP	**1950**	**51.41**	**100,211**
Short-Term	**279**	**39.58**	**10,688**
EH	**405**	**138.7**	**54,648**
Total Number of Clients	**2634**		

**Started the Program*

During FY22 (from July 1st, 2021 to November 16th, 2021): Total number of clients served in these programs is 1,367. See the breakdown of this data, along with the average Length of Stay (LOS) for each program below.

As of 11.16.2021			
Program Participants*	**Total Clients**	**Average LOS**	**Total Days**
THS/TLP	**1143**	**47.57**	**37,968**

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Short-Term	**86**	**35.75**	**2431**
EH	**138**	**28.68**	**3213**
Total Number of Clients	**1367**		

**Started Program*

2. Describe the unmet housing and service needs of qualifying populations, including but not limited to:
   a. Sheltered and unsheltered homeless populations: **Access to rent assistance and/or subsidized options, access to rental properties that do not require credit checks, access to rental properties that will house people with a criminal background.**
   b. Currently housed populations at risk of homelessness: **Income instability and/or living in non-recovery focused environments/neighborhoods that may jeopardized housing.**
   c. Other families requiring services or housing assistance or to prevent homelessness: **Not applicable**
   d. Those at greatest risk of housing instability or in unstable housing situations: **Adult Correctional Clients have a criminal background which creates a barrier to securing long-term housing. This barrier widens for Correctional Clients with violent, drug-related, or sex offender charges. Often, available housing is located in non-recovery environments (locations with higher rates of crime and more access to drugs). Additionally, Correctional Clients typically have poor or no rental history, poor credit scores, and/or housing references to complete a successful rental application. Affordable housing options are needed for Correctional Clients without the barriers listed above.**
   e. How can Division of Energy, Housing and Community Resources, utilizing HOME- ARPA funds assist in shortening the length of time this population is homeless? **See comment D.**

1. 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.
   Though Purchase of Goods and Services cover cost of stated housing services below, Correctional Clients are still able to access community resources and funding opportunities as available. The housing services listed (Emergency Housing, Transitional Housing, and Short-Term Housing) are funded through State revenue.

2. Identify any gaps within the current shelter and housing inventory as well as the service delivery system. **See response to 2d above.**

3. Identify the characteristics of housing associated with instability and an increased risk of homelessness.

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a. How should the State define "other populations" for eligibility under HOME-ARPA?
   - **Inclusion of individuals lacking rental history**
   - **Inclusion of individuals with criminal records which make housing challenging including individuals with felonies and sex offenses.**
   - **Individuals transitioning out of alternate care settings such as residential treatment programs, or short-term housing programs.**

3. Identify priority needs for qualifying populations.
   - **Rent assistance**
   - **Support services**
   - **Employment services**
   - **Mental health services**

5. Explain how the level of need, gaps in the shelter, housing inventory and service delivery systems were determined.
   - **Population based on data pulled from the DOC Program Data Collection System (PDCS), need/gaps determined by data, housing inventory determined by contracted providers.**

	Current Inventory	Level of Need	Gap Analysis
	Average Monthly Occupied Beds 396 (this number typically increase during colder months)	**Unknown – Level of Need changes frequently.**	**Unknown.**
These Housing Services are for Clients in need of housing. **Emergency Housing Units** **Short Term Housing Units** **Transitional Housing Units**	 **EH – 107 providers (# of units vary per provider).** **STH – 26 providers/locations-- # of units per location varies (1-14 beds)** **THS/TLP- 375 beds Statewide.**	Leave Blank	Leave Blank

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Department of Corrections, Division of Juvenile Corrections (DJC)

3. Describe the size and demographic composition of the qualifying populations residing within your organization's service area/boundaries.

DJC provides community supervision to youth that have been adjudicated delinquent and placed under the supervision of the Department, and youth where DJC provides supervision on behalf of the county. This supervision includes addressing housing and basic needs that are essential to the success of our youth. During FY 2021, DJC had an average daily population of 124 youth living in the community under DJC supervision. Of this population, an average daily population of 21.3 youth required placement outside of the home in alternate care settings such as group homes, and scattered site apartments.

4. Describe the unmet housing and service needs of qualifying populations, including but not limited to:
    a. Sheltered and unsheltered homeless populations: Not applicable
    b. Currently housed populations at risk of homelessness: See comment under D.
    c. Other families requiring services or housing assistance or to prevent homelessness: Not applicable
    d. Those at greatest risk of housing instability or in unstable housing situations: While under supervision youth are provided with stable housing by DJC. However, as their supervision ends additional supportive services and rent assistance may be beneficial to certain individuals that are managing limited rental history, access to employment and affordable housing. DJC does not have data on this population but estimates could range from 10 to 20 individuals annually.
    e. How can Division of Energy, Housing and Community Resources, utilizing HOME- ARPA funds assist in shortening the length of time this population is homeless? See comment D.

4. 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.

The population of youth living in alternate care settings are primarily funded through State general purpose revenue under the Serious Juvenile Offender program which is adjusted biennially to cover services such as youth housing, supervision, and supportive services, among others.

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5. Identify any gaps within the current shelter and housing inventory as well as the service delivery system. See response to 2d above.

3. Identify the characteristics of housing associated with instability and an increased risk of homelessness.
   b. How should the State define "other populations" for eligibility under HOME-ARPA?
      - Inclusion of individuals lacking rental history
      - Inclusion of individuals with criminal records which make housing challenging including individuals with felonies and sex offenses.
      - Individuals transitioning out of alternate care settings such as group homes, residential care centers, foster homes, etc.

6. Identify priority needs for qualifying populations.
      - Rent assistance
      - Support services
      - Employment services
      - Mental health services

5. Explain how the level of need, gaps in the shelter, housing inventory and service delivery systems were determined.
      - Population statistics based on data, gap analysis based on qualitative input from field and contract staff.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	Average Daily Population of 21.3 Contracted youth Placements	Unknown ongoing and transitional needs beyond DJC supervision	Unknown, estimated 10 to 20 individuals annually
Total Rental Units	**Enter # here**	Leave Blank	Leave Blank
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	**Enter # here**	Leave Blank	
Rental Units Affordable	**Enter # here**	Leave Blank	Leave Blank

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to HH at 50% AMI (At-Risk of Homelessness)			
0%-30% AMI Renter HH with 1 or more severe housing problems (At-Risk of Homelessness)	Leave Blank	**Enter # here**	Leave Blank
30%-50% AMI Renter HH with 1 or more severe housing problems (At-Risk of Homelessness)	Leave Blank	**Enter # here**	Leave Blank
Current Gaps	Leave Blank	Leave Blank	**Enter # here**

Wisconsin Department of Children and Families

The Department of Children and Families (DCF) appreciates the opportunity to respond to a DOA request for input on the State of Wisconsin's *Allocation Plan* for distributing an estimated $41.9 million in federal HOME Investment Partnerships Program (HOME) funds provided pursuant to the American Rescue Plan Act of 2021 (ARPA). Our department's vision is that ***all*** Wisconsin children and youth are safe and loved members of thriving families and communities. To reach our goal, we are focused on reducing racial and ethnic disparities in our programs and services, focusing on five key priorities:

- Systematically increasing access to quality early care and education programs that support the needs of children and families statewide;
- Putting families in the center of successful child support and good-paying jobs programs;
- Safely transforming the child welfare and youth justice system to dramatically increase the proportion of children supported in their homes and communities;
- Dedicating additional resources to support vulnerable and historically underserved youth, specifically teenage girls, kids with complex care needs, and youth transitioning out of the foster care system;
- Fostering a workplace where agency staff feel engaged, valued, and connected to our vision.

The priority of meeting the needs of vulnerable children and families is met through several areas of DCF programming. The DCF programs identified below serve target populations consistent with the HOME Investment Partnerships Program including individuals and families at risk of or receiving services to address homelessness. Also, as requested, the information provided below responds to DOA's request to address: 1) the demographic composition of eligible populations served, 2) background and current services and resources available, 3) unmet housing needs and service gaps, and how the HOME ARPA program funds could be used to assist the population at risk. DCF's response provides information on eligible populations that include runaway and homeless youth, families at risk of involvement in the state child

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welfare system, families served by the TANF Emergency Assistance Program, individuals at risk of/or experiencing domestic violence, and individuals and families served through Wisconsin Community Action Programs.

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Size and Demographic Composition	Background and Current Services/Resources Available	Unmet Housing Needs and Service Gaps	How HOME-ARPA support would help reduce homelessness
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. More Roughly 450 youth were provided shelter through state funded RHY programs in 2019.	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.	Youth brick-and-mortar youth shelter availability north of Dane County, and staff capacity statewide to address the influx of youth experiencing mental health challenges and housing instability. Due to limited funding availability, providers blend funding from multiple sources, including the federal Administration of Children and Families.	Increasing funding to build more shelter capacity and necessary services for this population.
Families at risk of/or engaged in the state child welfare system that are receiving child welfare services in their homes are considered at risk of homelessness. Data trends over the last five years show that the number of children removed during a CPS investigation has	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 our 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	Even prior to the onset of the current public health emergency, local 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 is his or her family home.	Increasing funding for targeted safety services to support key stabilization services would help prevent homelessness. Provide additional funding for Casey Family programs.

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Size and Demographic Composition	Background and Current Services/Resources Available	Unmet Housing Needs and Service Gaps	How HOME-ARPA support would help reduce homelessness
declined almost 30% from the highest number of children removed during this process of almost 3,700 in 2017 to almost 2,600 in 2020. Even more starkly, during the second half of calendar year 2020 and during the rise of increasing public health safety measures associated with the rise of COVID-19, there was a 24% decrease of entries into out-of-home entries which corresponded directly to the federal eviction moratorium. .	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.	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.	
DCF Emergency Assistance Program *target population* are determined as eligible based on family size and income. Between January 1, 2019 and December 8, 2021, the number of EA applicants statewide related to housing	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,	*Identified service gaps* include EA 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	Increase funding for EA program services Expand eligibility criteria for participating in the program

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Size and Demographic Composition	Background and Current Services/Resources Available	Unmet Housing Needs and Service Gaps	How HOME-ARPA support would help reduce homelessness
(homelessness or impending homelessness) was 48,453 and 14,326 were approved.	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.	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	

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Size and Demographic Composition	Background and Current Services/Resources Available	Unmet Housing Needs and Service Gaps	How HOME-ARPA support would help reduce homelessness
		$115% of the federal poverty level).	
In Wisconsin, almost 3,000 adults, who were victims or survivors of domestic violence, received at least one night of shelter in FFY 21. Survivors of domestic violence, and their children, are in desperate need for additional housing assistance to prevent homelessness.	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 4 communities. DCF anticipates that Wisconsin Community Action Agencies funded partially by DCF that administers to the Community Services Block Grant Program additional ARPA	Victims and survivors of domestic violence area 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.	Develop more safe and affordable housing for DV survivors and victims. Provide more support of housing first efforts for individuals affected by DV.
The Wisconsin Community Action Program Association (WISCAP) estimates that one in ten Wisconsinites live in poverty.	WISCAP is the association of Community Action Agencies in WI, which includes 18 total agencies - https://www.wiscap.org/. Two of the agencies are "single purpose" agencies, however they are subject to all the same community action agency/CSBG requirements. These two are UMOS and the Foundation for Rural Housing, which are both very involved in these efforts along with WISCAP and are included in WISCAP's annual report outcomes. CAP agencies serve the needs of low-income individuals and families in urban and rural areas. According to WISCAP's 2020 Annual Report, agencies distributed over $28.4 million in Wisconsin Rental Assistance Program (WRAP) funds to more than 14,000 households in every Wisconsin county, served 164,000 people monthly at 266 pantries, provided energy assistance to 18,552 households, and extended technical assistance to 134	WISCAP identifies a critical need as *permanent, affordable housing* to address the intersecting crises of rising rents, expiring tax credits, and growing income inequality.	Provide funding for housing navigators/additional case management services to assist in the search for and acquisition of a full range of housing options; and, broader, large-scale diversion (prevention) efforts. Provide funding for data collection/analysis to better understand and document housing needs and solutions.

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Size and Demographic Composition	Background and Current Services/Resources Available	Unmet Housing Needs and Service Gaps	How HOME-ARPA support would help reduce homelessness
	existing business, helping to preserving 262 full-time jobs that were in danger of being lost.		