



**State of Wisconsin**  
Department of Administration  
(DUNS No. 80-903-6098)

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**Consolidated  
Annual  
Performance  
And  
Evaluation  
Report**

April 1, 2021- March 31, 2022

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

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## CR-05 GOALS AND OUTCOMES

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

#### **CDBG**

The number of businesses assisted with CDBG economic development program (CDBG-ED) funds was lower than anticipated. Under the current lending environment, businesses are finding conventional loans more advantageous than the underwriting, compliance, and long-term reporting commitments required for CDBG-ED funding. DEHCR is currently working with stakeholders to make CDBG-ED funds less burdensome with the hopes of stimulating interest in the program.

DEHCR provided training through the annual application and implementation trainings. During PY 2021, DEHCR finalized the awarding of all CDBG-CLOSE funds. DEHCR will continue to monitor the use of CDBG-CLOSE funds to ensure conformance with all applicable regulations. With the transition to all grants made from CDBG-ED funds, DEHCR has resolved the issues surrounding CDBG-ED awards.

The number of communities assisted with CDBG Planning (CDBG-PLNG) remains low. DEHCR received three applications during the program year and funded three. DEHCR staff promotes the planning program through contact with consultants, funding agency staff, and presentations at professional organization events. Planning utilization has historically been a challenge due to projects needing to meet a national objective and result in an eligible activity outcome. DEHCR accepts PLNG applications on an on-going basis to stimulate interest for the program.

The number of persons assisted with CDBG funds for public facilities projects (CDBG-PF) did not meet expectations. DEHCR received 45 accepted applications in the 2021 program year and funded 26. The CDBG-PF program continues to be in high demand with many non-entitlement communities facing challenges with aging public infrastructure. DEHCR anticipates the high demand for CDBG-PF dollars to continue in the coming years.

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

#### **HOME**

The average amount of HOME-HHR assistance provided to homebuyers in Program Year 2021 was higher than planned by approximately 13 percent (\$17,525 planned versus \$19,803 actual) which is outside the variance rate for the program. This increase in cost corresponded with a lower number of homebuyers receiving assistance; as fewer units were available during the 2021 program year. Higher assistance amounts were needed to meet affordability goals. To make more homes affordable to Low-Moderate Income (LMI) families, a greater supply of available housing was required.

The average amount of assistance provided to homeowners for rehabilitation in Program Year 2021 was 18% higher than planned (\$40,000 planned versus \$47,360 actual) which is outside the variance rate for the program. The higher cost can be attributed to increasing costs and scope of work that needs to be done. Again, a lack of available houses to rehabilitate was experienced in Wisconsin.

HOME-RHD accepted applications during two formal competitions held in June and October of 2021 with a total of 12 applications received. HOME-RHD also provides an opportunity for small developers to apply for funding through a rolling application process. HOME-RHD funding provided for construction, and/or rehabilitation of 52 affordable rental units.

HOME-TBRA provided rental assistance to 2,487 households which were homeless or at risk of homelessness. Households served greatly exceeded goals for the program year. All HOME TBRA grantees are required to affirmatively market their programs to all qualifying members of their target populations, which include people who are homeless or at risk of homelessness. Through program efficiencies undertaken in Substantial Amendment #4, the State has considerably expanded its service area and numbers of households served through the HOME- TBRA program. The state also continued a service approach which required grantees to cover more than one county. Program year 2021 grantees' received contracts after a competitive application to provide additional coverage and opportunity for recipients to fully utilize funding. All PY20 HOME TBRA grantees were awarded funding in PY21.

### **ESG**

The ESG program has made significant progress towards its goals. The ESG program overall served more than the total number of persons anticipated in the goals; however, the split between the different goals or ESG project types was different than the Action Plan goals. More persons were served in homelessness prevention, tenant-based rental assistance/rapid re-housing and prevention than anticipated; however, fewer were served in emergency shelters than anticipated. There are several explanations for this.

- The number of shelter nights has increased, likely due to the lessening of COVID restrictions, which allowed for higher shelter capacity, closer to pre-pandemic levels.
- There was a significant increase in persons served in homelessness prevention. This is likely due to the expiration of eviction moratoria as well as the importance of keeping persons in existing housing due to the limited rental market.
- While rapid re-housing providers across the state are having difficulties identifying housing for clients to move into, they are able to maintain their levels of service. However, a lack of available rental housing across rural Wisconsin is preventing greater successes. This prolongs periods of homelessness and means that fewer households are served. Providers are engaging landlords, and work with households to address barriers to housing.
- Emergency shelters are focused on prioritization using coordinated entry and diversion. Some households who have low barriers to housing may not be enrolled in a rapid re-housing program because they are capable of obtaining housing quickly on their own. This causes the program to have a higher cost per person, but will result in more persons in the state exiting homelessness.
- The focus on rapid re-housing has meant that some grantees have shifted resources towards rapid re-housing programs. The state is supportive of this approach as it is an overall more efficient use of ESG funding.

### **HOPWA**

Short-term rental, mortgage, utility and supportive services assistance was provided to 79 households with HOPWA funding.

## **HTF**

The Wisconsin Housing and Economic Development Authority (WHEDA) submitted the 2021 allocation plan, with the goal of creating 146 units through the Housing Trust Fund program for the extremely low-income. WHEDA conducted two competitive rounds of applications for the allocation of HTF, in May 2021 and September, 2021.

In May, four Housing Tax Credit recipients submitted applications for an allocation of HTF. Three applications were fully awarded, and one was partially awarded. This accounted for what will be the eventual creation of 171 units of affordable housing – with 48 of those targeted towards the extremely low-income population and identifying as HTF units. One project is currently under construction and the remaining two projects are working toward financial closing. In September, four Housing Tax Credit recipients submitted applications for an allocation of HTF. One application was fully awarded. This project will result in 32 new units of supportive housing.

## Accomplishments – Program Year

Goal	Category	Outcome																									
Rehabilitate Owner Occupied Housing	Affordable Housing	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Homeowner Housing Rehabilitated</td> <td>931</td> <td>412</td> <td>Household Housing Unit</td> <td>44.2</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Homeowner Housing Rehabilitated	931	412	Household Housing Unit	44.2															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Homeowner Housing Rehabilitated	931	412	Household Housing Unit	44.2																							
Rehabilitate Rental Housing	Affordable Housing	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Rental units rehabilitated</td> <td>237</td> <td>8</td> <td>Household Housing Unit</td> <td>3.38</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Rental units rehabilitated	237	8	Household Housing Unit	3.38															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Rental units rehabilitated	237	8	Household Housing Unit	3.38																							
Build New Rental Housing	Affordable Housing	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Rental units constructed</td> <td>109</td> <td>144</td> <td>Household Housing Unit</td> <td>132.1</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Rental units constructed	109	144	Household Housing Unit	132.1															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Rental units constructed	109	144	Household Housing Unit	132.1																							
Provide Down Payment Assistance to Homebuyers	Affordable Housing	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Direct Financial Assistance to Homebuyers</td> <td>353</td> <td>77</td> <td>Households Assisted</td> <td>21.8</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Direct Financial Assistance to Homebuyers	353	77	Households Assisted	21.8															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Direct Financial Assistance to Homebuyers	353	77	Households Assisted	21.8																							
Provide Tenant-Based Rental Assistance	Affordable Housing	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Tenant-based rental assistance / Rapid Rehousing</td> <td>1,282</td> <td>2,487</td> <td>Households Assisted</td> <td>193.9</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Tenant-based rental assistance / Rapid Rehousing	1,282	2,487	Households Assisted	193.9															
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Tenant-based rental assistance / Rapid Rehousing	1,282	2,487	Households Assisted	193.9																							
Provide Homeless Assistance	Homeless	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Tenant-based rental assistance / Rapid Rehousing</td> <td>1,638</td> <td>2,683</td> <td>Households Assisted</td> <td>163.8</td> </tr> <tr> <td>Homeless Person Overnight Shelter</td> <td>14,000</td> <td>13,461</td> <td>Persons Assisted</td> <td>96.1</td> </tr> <tr> <td>Homelessness Prevention</td> <td>4,000</td> <td>8,744</td> <td>Persons Assisted</td> <td>218.6</td> </tr> <tr> <td>Other</td> <td>1,000</td> <td>3,007</td> <td>Other Households Assisted</td> <td>300.7</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Tenant-based rental assistance / Rapid Rehousing	1,638	2,683	Households Assisted	163.8	Homeless Person Overnight Shelter	14,000	13,461	Persons Assisted	96.1	Homelessness Prevention	4,000	8,744	Persons Assisted	218.6	Other	1,000	3,007	Other Households Assisted	300.7
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Other	1,000	3,007	Other Households Assisted	300.7																							
		<b>*No longer a valid project type within HMIS; replaced with Services Only</b>																									
Assist Communities with Public Facilities Projects	Non-Housing Community Development	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit</td> <td>140,600</td> <td>48,245</td> <td>Persons Assisted</td> <td>34.3</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	140,600	48,245	Persons Assisted	34.3															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	140,600	48,245	Persons Assisted	34.3																							
Create Jobs Through ED Assistance and Job Training	Non-Housing Community Development	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Jobs created/retained</td> <td>73</td> <td>15</td> <td>Jobs</td> <td>20.5</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Jobs created/retained	73	15	Jobs	20.5															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Jobs created/retained	73	15	Jobs	20.5																							
Increase Housing Options for Persons with HIV/AIDS	Non-Homeless Special Needs	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Expected</th> <th>Actual</th> <th>Unit of Measure</th> <th>Percent complete</th> </tr> </thead> <tbody> <tr> <td>Tenant-based rental assistance / Rapid Rehousing</td> <td>131</td> <td>79</td> <td>Households Assisted</td> <td>60.3</td> </tr> </tbody> </table>	Indicator	Expected	Actual	Unit of Measure	Percent complete	Tenant-based rental assistance / Rapid Rehousing	131	79	Households Assisted	60.3															
		Indicator	Expected	Actual	Unit of Measure	Percent complete																					
Tenant-based rental assistance / Rapid Rehousing	131	79	Households Assisted	60.3																							

Assist Communities with Emergency Assistance	Affordable Housing Non-Housing Community Development	<b>Indicator</b>	<b>Expected</b>	<b>Actual</b>	<b>Unit of Measure</b>	<b>Percent complete</b>
		Households Assisted	68	3	Households Assisted	4.41

Assist Communities with Local Planning	Non-Housing Community Development	<b>Indicator</b>	<b>Expected</b>	<b>Actual</b>	<b>Unit of Measure</b>	<b>Percent complete</b>
		Other	9	2	Other	22.2

Special Projects	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	<b>Indicator</b>	<b>Expected</b>	<b>Actual</b>	<b>Unit of Measure</b>	<b>Percent complete</b>
		Other	1	0	Other	0.00

**Table 1 – Accomplishments – Program Year**

## Accomplishments – Strategic Plan to Date

Goal	Category	Funding		Outcome							
Rehabilitate Owner Occupied Housing	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit				
		CDBG	\$47,947,548.00					Homeowner Housing Rehabilitated	1,914	1,089	Hous
		HOME	\$10,533,180.00								
Rehabilitate Rental Housing	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit				
		CDBG	\$384,221.00					Rental units rehabilitated	418	19	Hous
		HOME	\$12,339,149.00								
		HTF	\$4,860,636.00								
Build New Rental Housing	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit				
		HOME	\$24,678,299.00					Rental units constructed	211	261	Hous
		HTF	\$19,442,544.00								
Provide Down Payment Assistance to Homebuyers	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit				
		CDBG	\$12,151,082.00					Direct Financial Assistance to Homebuyers	674	158	Hous
		HOME	\$14,545,820.00								
Provide Tenant-Based Rental Assistance	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit				
		HOME	\$25,256,279.00					Tenant-based rental assistance / Rapid Rehousing	2,559	4,546	Hous
Provide Homeless Assistance	Homeless	Source	Amount	Indicator	Expected	Actual	Unit				
		ESG	\$18,448,740.00					Tenant-based rental assistance / Rapid Rehousing	3,276	4,270	Hous
								Homeless Person Overnight Shelter	28,000	22,720	Perse
								Homelessness Prevention	8,000	15,268	Perse
				Other	3,000	3,817	Othe				
Assist Communities with Public Facilities Projects	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit				
		CDBG	\$67,569,923.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	233,590	97,705	Perse				
Create Jobs Through ED Assistance and Job Training	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit				
		CDBG	\$6,624,502.00	Jobs created/retained	907	84	Jobs				
		Source	Amount	Indicator	Expected	Actual	Unit				

Increase Housing Options for Persons with HIV/AIDS	Non-Homeless Special Needs	HOPWA	\$3,906,835.00	Tenant-based rental assistance / Rapid Rehousing	268	161	Hous
Assist Communities with Emergency Assistance	Affordable Housing Non-Housing Community Development	<b>Source</b>	<b>Amount</b>	<b>Indicator</b>	<b>Expected</b>	<b>Actual</b>	<b>Unit</b>
		CDBG	\$10,599,204.00	Households Assisted	145	67	Hous
		Other	\$15,355,000.00				
Assist Communities with Local Planning	Non-Housing Community Development	<b>Source</b>	<b>Amount</b>	<b>Indicator</b>	<b>Expected</b>	<b>Actual</b>	<b>Unit</b>
		CDBG	\$1,324,900.00	Other	20	9	Othe
Special Projects	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	<b>Source</b>	<b>Amount</b>	<b>Indicator</b>	<b>Expected</b>	<b>Actual</b>	<b>Unit</b>
		CDBG	\$7,949,403.00	Other	2	0	Othe
		HOME	\$0.00				

**Table 2 – Accomplishments – Strategic Plan to Date**

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

**CDBG**

The annual application and implementation trainings provided by DEHCR have aligned with community needs for infrastructure upgrades. An opportunity exists to emphasize additional CDBG-PLNG and CDBG-ED funding availability with community stakeholders during the training programs. DEHCR also has identified the need for additional marketing throughout the state to utilize available funds and meet program goals.

The use of CDBG-H funds as no-interest loans assists low- and moderate-income households to address structural needs they might not otherwise be able to afford and meets state priorities of serving both rental units and owner-occupied units. The program requires a pre- and post-construction inspection to guarantee finished projects meet safe and sanitary guidelines, particularly in the area of lead-safe rehabilitations, which is identified as a program and statewide priority.

**HOME**

The state uses about 45 percent of HOME funding to provide affordable housing for single families throughout Wisconsin. Funding is distributed by regions; 58 percent is for homebuyer down payment assistance and 42 percent is for owner occupied housing rehabilitation. To meet the goals and objectives, contracts are awarded on a competitive basis to non-profit organizations and local units of

government statewide. Each grantee is then monitored annually to ensure all HOME requirements are being followed correctly.

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

HOME-TBRA target populations in 2021 were chronically homeless individuals and families, homeless individuals and families with a disability, individuals and families who are at risk of homelessness, and other special needs as designated by the local homeless coalitions and outlined in a specific grant application. As a result, the majority of HOME-TBRA participants are homeless or at risk of homelessness. HOME-TBRA grantees are required to affirmatively market their HOME-TBRA programs to all members of their target populations, which necessarily include people who are homeless or at risk of homelessness. They are also required to identify those target populations least likely to apply for HOME-TBRA and determine what special outreach activities will ensure they are fully informed about HOME-TBRA. Substantial Amendment #4 to the 2015-2019 Consolidated Plan made changes to eligibility criteria that become effective in program year 2019. As a result, DEHCR was able to dramatically increase the numbers of persons served by HOME-TBRA.

#### **HOPWA**

Vivent Health (formerly named AIDS Resource Center of Wisconsin), the project sponsor for the state formula HOPWA grant, provides short term rental, mortgage and utility assistance and supportive services to clients. The majority of clients had income and were insured and connected to care; stability in housing staff and collaboration with partner agencies has assisted in this outcome. Vivent Health reports benefitting from the HOPWA Institute to make important revisions to the housing procedures and policies manual. Short-term rental, mortgage and utility assistance was provided to 79 households with HOPWA funding.

#### **HTF**

The Wisconsin Housing and Economic Development Authority established specific objective priorities in the annual Housing Trust Fund allocation plan. In 2021, the allocation plan outlined the priorities of ensuring additional units targeted to the extremely low-income population are created within specific ideal parameters. These include projects being located in specific geographic locations, projects utilizing rental assistance subsidies, ensuring projects remain affordable for an extended period of time, incentivizing projects to developer under the scope of Wisconsin's housing policy priority needs to serve households at or below 30% CMI headed by veterans, persons with disabilities and/or impacted by homelessness, and the use of non-federal funds. The annual allocation plan also promoted the rehabilitation of HUD and RD properties along with limiting the Housing Trust Fund request a project makes.

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

The 2021 Allocation plan promoted projects to incorporate federal, state, or local project-based rental assistance. Forms of rental assistance could include: Section 8 or Section 515 project-based assistance,

project-based vouchers, 811 vouchers, NAHASDA funding for rental assistance, or similar project-based rental assistance or operating subsidy.

All projects awarded Housing Trust Fund dollars in 2021 will enter a Land Use Restriction Agreement upon closing on the funds. The LURA will remain in place for 30 years.

Projects are incentivized to meet the state of Wisconsin's priority housing needs. WHEDA awards points to properties designed to serve the homeless and/or veterans requiring supportive services.

WHEDA's Housing Trust Fund program incentivizes the use of non-federal funding sources by offering points for the portion of the total development budget to be paid by non-federal funding sources.

Finally, WHEDA provides points to projects which utilize fewer Housing Trust Funds per unit.

## **Racial and Ethnic Status**

	CDBG	HOME	ESG	HOPWA
<b>Race:</b>				
White	54,972	1,469	6,655	49
Black or African American	1,024	862	4,528	62
Asian	458	19	112	2
American Indian or American Native	642	118	480	-
Native Hawaiian or Other Pacific Islander	6	8	51	1
<b>Total</b>	<b>57,102</b>	<b>2,476</b>	<b>11,826</b>	<b>114</b>
<b>Ethnicity:</b>				
Hispanic	3,354	205	1,030	10
Not Hispanic	53,748	2,271	10,768	130

**Table 3 – Racial and Ethnic Status**

## **Additional Narrative**

### **CDBG program TOTAL families/persons assisted equals 57,112**

10 additional families/persons assisted by the CDBG program also include:

Race data

10 Other multi-racial

### **HOME program TOTAL families/persons assisted equals 2,502**

26 additional families/persons assisted by the HOME program also include:

Race data

26 Other multi-racial

### **ESG program TOTAL families/persons assisted equals 11,983**

157 Other multi-racial

### **HOPWA program TOTAL families/persons assisted equals 143**

29 additional families/persons assisted by the HOPWA program also include:

Race data

29 Other multi-racial

### **HTF program TOTAL families/persons assisted equals 0**

## CR-15 RESOURCES AND INVESTMENTS

### Resources Made Available

Source of Funds	Source (Federal, state local)	Resources Made Available	Amount Expended During Program Year Program Year 2021
CDBG	public - federal	\$84,790,811	\$76,529,876
HOME	public - federal	\$24,103,664	\$9,255,360
ESG	public - federal	\$3,689,266	\$4,590,425
HOPWA	public - federal	\$877,341	\$1,042,598
HTF	public - federal	\$19,751,483	\$5,473,518

**Table 4 – Resources Made Available**

### Geographic Distribution and Location of Investments

DEHCR has not chosen geographic target areas as a basis for funding allocation priorities. Rather, DEHCR allows all non-entitlement communities to submit applications to programs on a competitive basis. DEHCR's rationale for the priorities for allocating investments geographically is explained by each program.

#### **CDBG**

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

#### **HOME**

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

#### **ESG**

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

#### **HOPWA**

DEHCR ensures, currently through its contract with Vivent Health (formerly known as AIDS Resource Center of Wisconsin), full coverage in the 66 counties in DEHCR's HOPWA area.

## **Leveraging**

### **CDBG**

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

### **HOME**

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

### **ESG**

The ESG program exceeded its match requirement this year, as shown in CR-75. In 2021, \$1,515,000 in state homelessness prevention and rapid re-housing funding was awarded to ESG grantees along with federal ESG funding. This funding is used to satisfy a portion of the match requirement, and the rest of the match requirement is met through federal, state, and local government funding, private donations, and donated materials, services, and labor.

## **Fiscal Year Summary HOME Match**

<b>Fiscal Year Summary - HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$94,992,190
2. Match contributed during current Federal fiscal year	\$594,221
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$95,586,411
4. Match liability for current Federal fiscal year	\$0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$94,586,411

**Table 5 – Fiscal Year Summary HOME Match**

### Match Contribution for the Federal Fiscal Year

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution (mm/dd/yyyy)	Cash (non-federal sources)	Foregone Taxes, Fees, Charges	Appraised Land /Real Property	Required Infrastructure	Site Prep, Construction Materials, Donated Labor	Bond Financing	Total Match
HHR 18.02	6/18/2021	\$28,009.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$28,009.00
HHR 18.04	6/21/2021	\$10,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10,000.00
HHR 18.06	6/21/2021	\$8,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,000.00
HHR 18.12	6/21/2021	\$6,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,000.00
HHR 18.13	6/24/2021	\$32,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$32,000.00
HHR 18.16	7/7/2021	\$18,754.00	\$0.00	\$0.00	\$271,300.43	\$0.00	\$0.00	\$290,054.43
TBRA 19.01	6/1/2021	\$689.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$689.25
TBRA 20.01	9/1/2021	\$608.55	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$608.55
TBRA 20.02	9/1/2021	\$8,681.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,681.00
TBRA 19.03	6/1/2021	\$3,726.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,726.00
TBRA 20.03	9/1/2021	\$2,951.61	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,951.61
TBRA 19.04	6/1/2021	\$23,210.38	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$23,210.38
TBRA 20.04	9/1/2021	\$14,542.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$14,542.00
TBRA 19.05	1/1/2021	\$7,219.28	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7,219.28
TBRA 20.05	9/1/2021	\$7,286.33	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7,286.33

TBRA 20.06	9/1/2021	\$49,913.19	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$49,913.19
TBRA 19.07	5/1/2021	\$432.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$432.00
TBRA 20.07	9/1/2021	\$370.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$370.00
TBRA 19.08	6/1/2021	\$3,100.39	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,100.39
TBRA 20.08	9/1/2021	\$2,656.92	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,656.92
TBRA 20.10	9/1/2021	\$16,866.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$16,866.25
TBRA 20.12	9/1/2021	\$27,832.22	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$27,832.22
TBRA 19.13	6/1/2021	\$12,074.65	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$12,074.65
TBRA 20.13	8/1/2021	\$2,395.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,395.00
TBRA 20.14	9/1/2021	\$1,831.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,831.00
TBRA 19.15	6/1/2021	\$4,350.14	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,350.14
TBRA 20.15	9/1/2021	\$5,407.27	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,407.27
Totals:		\$322,920.43	\$0.00	\$0.00	\$271,300. 43	\$0.00	\$0.00	\$594,220.8 6

**Table 6 – Match Contribution for the Federal Fiscal Year**

## HOME Program Income

Program Income – Enter the program income amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$7,654,466	\$4,893,834	\$1,392,955	\$0	\$11,155,345

**Table 7 – HOME Program Income**

## Minority Business and Women Business Enterprises (MBE-WBE)

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts: Number</b>	743	3	1	2	2	735
Dollar Amount	\$156,536,355	\$76,884	\$500	\$125,386	\$18,080	\$156,315,505
<b>Sub-Contracts: Number</b>	59	14	5	0	20	20
Dollar Amount	\$54,604,438	\$53,033	\$145,844	\$0	\$1,979,191	\$52,426,370
	Total	Women Business Enterprises	Male			
<b>Contracts: Number</b>	745	20	725			
Dollar amount	\$157,744,062	\$3,748,278	\$153,995,785			
<b>Sub-Contracts: Number</b>	699	82	617			
Dollar Amount	\$54,794,267	\$7,097,056	\$47,697,211			

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

## Minority Owners of Business Property

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

**Table 9 – Minority Owners of Business Property**

## Relocation and Property Acquisition

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

**Table 10 – Relocation and Property Acquisition**

## CR-20 AFFORDABLE HOUSING

### Affordable Housing – Number of Households Assisted

	One-Year Goal	Actual
Number of homeless to be provided affordable housing units	359	696
Number of non-homeless to be provided affordable housing units	1,597*	636
Number of special-needs to be provided affordable housing units	923	1,924
<b>Total</b>	<b>2,879</b>	<b>3,256</b>

**Table 11 – Number of Households Assisted**

\*Includes HTF-funded ELI housing units

### Affordable Housing – Number of Households Supported

Number of households supported through:	One-Year Goal	Actual
Rental Assistance	1,282	2,620
The Production of New Units	109*	144
Rehab of Existing Units	1,159	418
Acquisition of Existing Units	329	73
<b>Total</b>	<b>2,879</b>	<b>3,255</b>

**Table 12 – Number of Households Supported**

\*Includes HTF-funded ELI housing units

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

#### CDBG

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

#### HOME

The average amount of HOME-HHR assistance provided to homebuyers in Program Year 2021 was higher than planned by approximately 13 percent (\$17,525 planned versus \$19,803 actual) which is outside the variance rate for the program. This increase in cost corresponded with a lower number of homebuyers receiving assistance; as fewer units were available during the 2021 program year. Higher assistance amounts were needed to meet affordability goals. It is possible that this occurrence will repeat in PY 22. To make more homes affordable to Low-Moderate Income (LMI) families, a greater supply of available housing was required.

The average amount of assistance provided to homeowners for rehabilitation in Program Year 2021 was 18% higher than planned (\$40,000 planned versus \$47,360 actual) which is outside the variance rate for

the program. The higher cost can be attributed to increasing costs and scope of work that needs to be done. Again, a lack of available houses to rehabilitate was experienced in Wisconsin.

HOME-TBRA provided rental assistance to 2,487 households which were homeless or at risk of homelessness. Grantees who had previously failed to meet their service goals were not renewed while new grantees were added. The state also continued a service approach which required grantees to cover more than one county. Most grantees also required a contract extension as there are significant shortfalls in available housing in rural areas. The improving housing market in rural areas of Wisconsin represented a major factor in locally-experienced rent increases and a shortage of affordable units available for rent.

The HOME-RHD program did not meet the goal for construction and/or rehabilitation of affordable rental units.

### **HTF**

The HTF program set a goal of completing one application cycle during PY 21; however, WHEDA held two application cycles: May and September 2021. During 2021, construction was completed on 92 total units and is in process on an additional 68 HTF units for a total of 160 units. Projects funded in PY 21 leveraged over \$71.2 million in non-federal funding sources. In addition, 54 units are committed to be designated for the homeless or veterans.

No applications were received for the northern half of the state. As the Housing Tax Credit program works to emphasize more rural development projects being completed, we anticipate this changing in the near future. Lastly, the average award per unit created was \$82,309, which was within the projected cost per unit.

## **Discuss how these outcomes will impact future Annual Action Plans**

### **CDBG**

Grantees continue to reach out to the contractor base in their service area and recruit contractors for the CDBG-H program. The CDBG-H program continues to make funds available to assist contractors in becoming trained in lead-safe work practices, lead abatement, and lead risk assessment. DEHCR is building on efforts to encourage collaboration between CDBG-H and home weatherization providers to maximize available resources.

### **HOME**

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

HOME-TBRA target populations in 2021 were chronically homeless individuals and families, homeless individuals and families with a disability, individuals and families who are at risk of homelessness, and other special needs as designated by the local homeless coalition and outlined in a specific grant

application. As a result, the majority of HOME-TBRA participants are homeless or at risk of homelessness. HOME-TBRA grantees are required to affirmatively market their HOME-TBRA programs to all members of their target populations, which necessarily include people who are homeless or at risk of homelessness. They are also required to identify those target populations least likely to apply for HOME-TBRA and determine what special outreach activities will ensure they are fully informed about HOME-TBRA. Substantial Amendment #4 to the 2015-2019 Consolidated Plan made changes to eligibility criteria that become effective in program year 2019. As a result, DEHCR was able to continue to serve a higher number of persons served by HOME-TBRA in program year 21 as compared to the average served prior to Substantial Amendment #4. HOME-TBRA funded successful placements will continue to be affected by the lack of safe, sanitary and affordable rental housing opportunities statewide.

**HTF**

WHEDA will adjust projected units created to reflect the higher average cost per unit. Additionally, WHEDA plans to evaluate options for added incentives to increase the number of HTF units created per HTF dollar invested. WHEDA plans to encourage HTF-funded new units to serve as workforce housing as well as located in rural areas of the state. WHEDA plans to strengthen the connection of the application processes of Housing Trust Funds and Housing Tax credits to increase both the alignment of the two funding sources as well as the efficiency in funds deployment. Lastly, WHEDA will adjust award sizing methodology to increase incentive for 30% units.

## **Number of Persons Served**

<b>Number of Persons Served</b>	<b>CDBG Actual</b>	<b>Home Actual</b>	<b>HTF Actual</b>
Extremely Low-income	108	724	92
Low-income	101	1,850	
Moderate-income	189	64	
<b>Total</b>	<b>398</b>	<b>2,638</b>	

**Table 13 – Number of Persons Served**

## **Additional Narrative**

All HOME-TBRA data comes from HMIS.

## CR-25 HOMELESS AND OTHER SPECIAL NEEDS

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

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

#### **HOME**

With the Substantial Amendment #4 made to the 2015-2019 Consolidated Plan, HOME TBRA program eligibility was expanded to enable grantees to provide rental assistance to homeless individuals/families and individuals/families who are at risk of homelessness without the requirement of a disabled family member. As a result, all HOME TBRA participants are homeless or at risk of homelessness.

All HOME TBRA grantees are required to affirmatively market their programs to all qualifying members of their target populations, which include people who are homeless or at risk of homelessness. Grantees are also required to identify those target populations least likely to apply for TBRA assistance and determine what special outreach activities are needed to ensure that their target populations are fully informed about the HOME TBRA program.

HOME TBRA programs are strongly encouraged to participate in Coordinated Entry and utilize any applicable Coordinated Entry procedures to evaluate client eligibility. Also, all grantees must comply with the Homeless Management Information System (HMIS). HMIS was implemented at the continuum of care (CoC) level; all Wisconsin HOME TBRA programs are active participants.

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

#### **ESG**

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

Street outreach to unsheltered persons is necessary to engage them and work towards housing stability. DEHCR encourages the use of best practices in street outreach which seek to meet basic needs and engage those experiencing homelessness in a respectful way.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

## **HOME**

Across fifteen programs, the HOME TBRA program provided 2,487 households with up to 18 months of transitional housing assistance in the form of rent, security deposits, and utility assistance across 66 Wisconsin counties. Target populations of the HOME TBRA program are restricted to the chronically homeless individuals/families, homeless individuals/families with a disability, individuals/families who are at risk of homelessness, and other special needs as designated by the local continuum of care (COC) and submitted grant application. As a result, most HOME TBRA clients are classified as homeless or at risk of homelessness. With the Substantial Amendment #4 made to the 2015-2019 Consolidated Plan, HOME TBRA program eligibility was expanded to enable grantees to provide rental assistance to homeless individuals/families without the requirement that they have a disabled family member.

## **ESG**

Emergency shelter is a critical part of the homeless service system. Shelters provide temporary refuge and often serve as the “front door” or first place of entry to those experiencing homelessness. As such, it is important that emergency shelters have the ability to connect those experiencing homelessness with the resources needed to exit homelessness, using the lightest touch possible. Approximately 78 percent of 2021 ESG funding was used for emergency shelter and rapid re-housing programs. In 2021, for the sixth time, DEHCR required ESG applicants to assess homeless system performance and use performance data when distributing funding at the local level. In many cases, applicants assessed shelter data to meet this requirement, and allocated more funding to shelters who are serving higher numbers of clients, moving clients into permanent housing quickly, and best ensuring that clients do not return to homelessness. New transitional housing projects are not funded by the ESG program, but DEHCR allows the use of transitional housing cases where it has been demonstrated to be efficient and effective.

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

## **ESG**

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

### **HOPWA**

The HOPWA program provided short-term rental, mortgage, utility and supportive services assistance was provided to 79 households with HOPWA funding.

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

### **HOME**

The HOME TBRA program assists beneficiaries in locating and selecting units that adhere to both HUD's Fair Market Rent (FMR) and rent reasonableness standards.

### **ESG**

The ESG program requires each local homeless coalition to have a rapid rehousing program and encourages local CoCs to spend more than the minimum requirement on rapid re-housing. Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing. This has the potential to decrease the length of time participants spend homeless, taking strain off of the shelter system. The funding formula which distributes ESG funding takes "exits to permanent housing" and "returns to homelessness" into account.

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

### **HTF**

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

## CR-30 PUBLIC HOUSING

### **Actions taken to address the needs of public housing.**

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

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

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

### **Actions taken to provide assistance to troubled PHAs.**

The State reviews the PHA's annual plans in developing its Consolidated Plan.

## CR-35 OTHER ACTIONS

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

The state included and submitted its Analysis of Impediments (AI) with its 2020-2024 Consolidated Plan. Wisconsin has been making progress towards eliminating the impediments identified in its AI and intends to continue to utilize applicable federal funding towards the furtherance of its goals. The Wisconsin “home rule” provision means that zoning ordinances are left to the judgment of local governments. Sometimes local governments, in an attempt to cover the broad-based costs of public facilities improvements or to slow down a boom in new housing starts will choose to impose impact fees, increasing lot sizes and setbacks, or establishing minimum square foot requirements for new residences.

State statutes do allow local governments to waive impact fees for affordable housing developments, but it is not known how often these fees are actually waived. The net effect of these local actions may make housing more expensive than it would be without the new fees and regulations which may represent a barrier to affordable housing for people in lower income brackets.

DEHCR respects this constitutional policy of local control, and therefore cannot directly intervene to remove barriers to affordable housing that results from a local ordinance’s imposition of regulations or fees. DEHCR and other state agencies do work to ameliorate barriers to affordable housing in several ways, including:

- Support for the [WIHousingSearch.org](http://WIHousingSearch.org) website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.
- DEHCR works to improve the stock of affordable housing in non-entitlement jurisdictions through its state- and federally funded housing programs.
- WHEDA’s LIHTC program offers a reduction in tax liability to property owners and private investors to encourage the development of affordable rental housing.
- WHEDA, the State of Wisconsin’s designated Housing Trust Fund administrator, will utilize those funds to ameliorate barriers to affordable housing and develop affordable rental housing.

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

### **Actions taken to address obstacles to meeting underserved needs**

#### **CDBG**

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

DEHCR will continually evaluate its administration of CDBG funds in order to meet Wisconsin’s affordable housing and community and economic development needs. DEHCR will continue to work collaboratively with Units of General Local Government (UGLGs) so that nonprofit entities and

businesses will be able to receive grants, loans, and/or equity investments for activities that are both allowed under the federal guidelines and best address the needs of the local community.

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

- Collaborate with WHEDA, HUD, USDA Rural Development, and US Department of Commerce-Economic Development Administration to:
  - Address special housing and community and economic development opportunities.
  - Sponsor training and technical assistance for local officials. This will increase knowledge of and access to available state and federal programs and resources.
- Review current policies and procedures related to maximizing the efficient reuse of program income funds to meet critical needs. DEHCR will pursue modifications where redirecting resources could address needs in programs with unmet critical needs.
- DEHCR is building on efforts to encourage collaboration between CDBG-H and home weatherization providers to maximize available resources.

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

### **HOME**

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

### **ESG**

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

### **HTF**

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

### **Actions taken to reduce lead-based paint hazards**

The CDBG-H and HOME programs require all pre-1978 homes be rehabilitated in a lead-safe manner. 120 CDBG-H housing units (owner occupied =120, rental units = 0) and 59 HOME-HHR units were rehabilitated using lead-safe work practices (see IDIS HOME lead-based paint report) during the 2021 program year.

The programs will continue to ensure all rehabilitation on pre-1978 homes is done in a lead-safe manner, including abatement, interim controls or standard practices, lead safe work practices, visual assessment/paint stabilization or other actions required by federal regulation. All projects that utilize lead-safe work practices receive a lead clearance to ensure the property is safe from lead hazards. All units subsidized by HOME-TBRA funding must pass a HUD Housing Quality Standards (HQS) inspection before move-in and at least once annually thereafter. HQS requires that units built before 1978 and occupied by households with least one child under the age of six have no peeling paint on interior and exterior surfaces. CDBG-H requires that units built before 1978 have little to no peeling paint on most interior and exterior surfaces regardless of the age of the housing occupants. Additionally, the ESG program requires grantees to comply with all applicable lead-based paint remediation and disclosure laws.

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

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

### **Actions taken to reduce the number of poverty-level families**

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

#### **CDBG**

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

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

#### **HOME**

HOME-HHR grantees are encouraged to hire Section 3 employees and train others in the construction industry that are considered Section 3.

## **ESG**

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

## **HTF**

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

## **Actions taken to develop institutional structure**

The need for CDBG housing and community development projects continues to exceed available funding. The allocation of CDBG funds that occurred in Program Year 2020 allowed DEHCR to focus needed resources on housing and public facility projects without adversely affecting DEHCR's ability to support appropriate economic development projects.

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

## **HOME**

DEHCR also has HOME programs to complement existing networks of service providers. DEHCR continues its long-term support of stable non-profit organizations that provide services in areas covering most of the state. Collaborative efforts among local agencies are strongly encouraged. Training and technical assistance continue to improve the delivery of housing and homeless assistance. The HOME-HHR program continues to work with approximately 16 non-profit organizations to develop statewide network. DEHCR also works with partner agencies to identify opportunities for weatherization and housing to work together. DEHCR believes this approach will lead to improved efficiencies for both programs and the clients we serve.

## **ESG**

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

## **HTF**

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

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

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

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

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

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

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

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

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

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

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

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

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

**IMPEDIMENT #2: LOCAL LAND-USE REGULATIONS.**

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

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

The success of state HOME recipients in promoting their program locally and providing affordable housing opportunities to all racial and ethnic groups is evidenced by the reporting identified under CR-10. Per the report, non-white households account for 10.2 percent of the HOME rental projects, homebuyer projects, and homeowner rehab projects. These percentages compare favorably with the 2016 American Community Survey estimate of a 7.2 percent ethnic and minority population for the Wisconsin Balance of State (the category that closely aligns with the state’s jurisdiction). In addition, non-white households account for 38.9 percent of the HOME-TBRA program recipients.

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

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

**IMPEDIMENT #3: LOCAL DISCRIMINATION IN CONSUMER LENDING.**

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

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

The Wisconsin Department of Financial Institutions (DFI) has amended ss. DFI-Bkg 80.85 (1) and (2), and created s. DFI-BKG 80.85 (5), Wis. Admin Code (DFI-WCA1 Wisconsin Consumer Act), effective 09/17/05, to expand the bases of discrimination for consumer lending by banks. The rule makes discrimination on a prohibited basis in the granting or extension of credit an unconscionable credit practice. The rule now defines prohibited basis to include sex, marital status, age provided the applicant has the capacity to enter into a binding contract, race, creed, religion, color, disability, national origin, ancestry, sexual orientation, or membership in the military forces of the United States or this state; that all or part of the applicant’s income derives from any public assistance program; and that the applicant has in good faith exercised any right under the Consumer Credit Protection Act or any state law.

**IMPEDIMENT #4: PREDATORY LENDING.**

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

**ACTION TO ADDRESS IMPEDIMENT #4: PREDATORY LENDING.**

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

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

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

**IMPEDIMENT #5: PREDATORY APPRAISALS.**

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

**ACTION TO ADDRESS IMPEDIMENT #5: PREDATORY APPRAISALS.**

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

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

Federal mandate requires that after January 1, 1993, all appraisers must be licensed or certified by a state licensing agency in order to conduct appraisals which involve "federally related transactions." However, appraisers are not required to be licensed or certified in Wisconsin in order to perform "non-federally related transactions."

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

**IMPEDIMENT #6: HOUSING STOCK.**

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

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

**ACTION TO ADDRESS IMPEDIMENT #6: HOUSING STOCK.**

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

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

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

For this reporting period, CDBG, HOME, NSP1, NSP3, and state-funded programs continued to provide housing assistance for special needs households.

**IMPEDIMENT #7: LANGUAGE BARRIERS.**

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

**ACTION TO ADDRESS IMPEDIMENT #7: LANGUAGE BARRIERS.**

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

DEHCR provided \$62,150 in PY 21 for a contract with the Metropolitan Milwaukee Fair Housing Council (MMFHC) to address language barriers and to undertake a variety of fair housing related activities in both HOME entitlement and non-entitlement areas, including:

- **Fair housing complaint intake, investigation and referrals.** MMFHC received and processed complaints regarding discrimination based on race/color, national origin, sex, religion,

disability, familial status, age, marital status, lawful source of income, sexual orientation, and ancestry.

- **Conducting fair housing testing.** MMFHC conducted fair housing testing activities, including activities in HOME non-entitlement areas.
- **Offering referral services to clients with non-fair housing inquiries.** MMFHC provided referral services to clients with questions on topics such as rent abatement, breaking a lease, and repair-related concerns, including those in HOME non-entitlement areas.
- **Technical assistance in fair housing to Wisconsin residents, housing providers, and social service agencies throughout Wisconsin.** MMFHC provided technical assistance, including instances in HOME non-entitlement areas. The assistance provided included clarification of fair housing law, information on legal and/or administrative interpretation of the law, information on the nature and extent of housing discrimination, and demographic data.
- **Distribution of fair housing and fair lending educational materials.** MMFHC distributed significant fair housing and fair lending materials on numerous occasions throughout Wisconsin.
- **Conducting presentations, workshops, or trainings to provide information on fair housing and fair lending laws and practices.** MMFHC planned and conducted workshops in various locations around the state that covered fair housing law, fair lending, and predatory lending.

## CR-40 MONITORING

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

### **CDBG**

Units of General Local Government who receive CDBG funding in the CDBG-PF, CDBG-PLNG, CDBG-PFED, and/or CDBG-ED program are monitored prior to project completion. A risk matrix is completed prior to monitoring to identify risk criteria. The outcome of the risk matrix determines whether a desk monitoring or on-site monitoring visit is required. Minority Business Enterprises/Women's Business Enterprises (MBE/WBE) utilization is reported by grantees. Funded projects are reviewed for inclusion with UGLG comprehensive plans.

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

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

Program staff work with grantees to correct any identified deficiencies through the monitoring process. DEHCR annually lists its monitoring plan for the program year on its website including monitoring goals by program. No on-site inspections were performed during the PY21 period due to the Department's moratorium stemming from COVID-19.

### **HOME**

Grantees are monitored once a year. Annually, the HOME-HHR housing program develops a risk analysis of the grantees to prioritize grantees for desk or on-site monitoring. Based on the number of grantees, program staff conducts two monitoring reviews each month for compliance. Any findings and concerns are documented, and a corrective action is developed to ensure long term compliance of program requirements. No on-site inspections were performed during the PY21 period due to the Department's moratorium on unit inspections stemming from COVID-19.

HOME-RHD program staff develops a risk analysis of projects that are within their affordability period. Staff determine how often to monitor projects based on the results of the analysis. The program staff monitors all projects within twelve months of project completion, and then, based on the results of the risk analysis, projects are scheduled for monitoring at least once every three years. The HOME-RHD program staff conducts a minimum of two monitoring reviews each month; however, they frequently conduct additional monthly monitoring depending on the number of projects identified during the risk analysis. No on-site inspections were performed during the PY21 period due to the Department's moratorium on unit inspections stemming from COVID-19.

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

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

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

HOME-TBRA program subgrantees are monitored on an annual basis. During the monitoring process, programmatic procedures, fiscal procedures, client files, an HQS inspection of at least one HOME-TBRA-funded unit, and interviews with HOME-TBRA beneficiaries are completed. No on-site inspections were performed during the PY21 period due to the Department's moratorium on unit inspections stemming from COVID-19.

### **ESG**

DEHCR's ESG program conducts in-person site monitoring visits and desk monitoring to ensure that grantees are in compliance with the requirements of the ESG program. Standard forms that touch on financial standards and ESG-specific requirements are used for site and desk monitoring. DEHCR also regularly updates its ESG program manual to ensure grantees have an immediate resource when they have questions about ESG requirements. No on-site inspections were performed during the PY21 period due to the Department's moratorium stemming from COVID-19.

### **HOPWA**

HOPWA program project sponsors and subgrantees are monitored on an annual basis. During the monitoring process, programmatic procedures, fiscal procedures, client files, an HOPWA HQS habitability standards inspection of at least one HOPWA STRMU-funded unit, and interviews with HOPWA clients are completed. No onsite inspections were conducted during PY21 because of the Department's moratorium on unit inspections stemming from the COVID-19 pandemic.

### **HTF**

Two WHEDA staff members are dedicated to reviewing results of competitive allocation rounds and coordinating all program processes. Additional staff members tracking minority business outreach in the Housing Tax Credit program are now also assisting with tracking Housing Trust Fund activities. WHEDA's comprehensive program planning has involved coordination between many business units of WHEDA. Program requirements are clearly communicated with developers prior to closings and monitored throughout construction. Coordination between WHEDA and DOA occurs to ensure program environmental requirements are adhered to prior to deployment of funds. A cost certification is collected at project completion to ensure HTF dollars are going towards supporting households at or below 30% AMI. Borrowers provide a guarantee against any non-compliance with program regulations. 20% of HTF dollars are held back until construction completion.

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

Consistent with its Communication Plan, DEHCR posted notice in the May 12, 2022 and May 19, 2022 issues of the Wisconsin State Journal that a public hearing would be held for input regarding the CAPER. A telephonic Public Hearing was held on May 26th with directions for accessing the public hearing provided in the public notice. DEHCR posted the draft 2021 Consolidated Annual Performance and Evaluation Report (CAPER) on the Division's website.

The public input process lasted 15 days, beginning on May 26, 2022 and ending June 10, 2022. DEHCR submitted the CAPER to HUD on June 30, 2022. DEHCR read, responded to, and recorded every e-mail received. To the extent possible, DEHCR incorporated public comments into the 2021 CAPER. One public comment was received during the comment period.

## CR-45 CDBG

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

In order to meet its job creation goals, DEHCR will work to increase marketing efforts for the Community Development Block Grant programs that create LMI jobs. Under the current lending environment of low interest rates, businesses are finding conventional loans more advantageous than the underwriting, compliance, and long-term reporting commitments required for CDBG funding. This barrier can be overcome through marketing and outreach to local stakeholders and by providing training to make the rules and regulations seem more manageable.

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

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

No

## CR-50 HOME (HOME GRANTEEES ONLY)

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

No on-site inspections were performed during the PY21 period due to the Department's moratorium on unit inspections stemming from COVID-19.

The following projects should have been inspected on-site this program year based upon the monitoring schedule:

- 1.) Turtle Lake Villas
- 2.) Delavan Sr Housing/Parkside Village
- 3.) Ada James Place
- 4.) Colfax Prairie Homes
- 5.) Sunlight Terrace
- 6.) Sunrise Meadow (Townhomes)
- 7.) First Sr Apartments -Phase II
- 8.) Edgewood Glen Sr Living Community
- 9.) The Terraces of Geneva Crossing
- 10.) Prairie Meadows Sr Housing Phase II
- 11.) Pine River Terrace
- 12.) DeNeveu Creek Sr Retirement/Fond du Lac senior
- 13.) Parkside Apartments
- 14.) Mulberry Apt.
- 15.) Gateway Senior
- 16.) Waterloo Senior
- 17.) Ellsworth Town Homes/Trillium Green
- 18.) One Penny Place/Northwoods Senior
- 19.) Glenwood Sr Living Community
- 20.) Whitetail Cottages
- 21.) Southlake Senior Cottages III
- 22.) Pine Bend Townhomes
- 23.) Lakefront Senior Village LP
- 24.) Marquette Special Needs
- 25.) St. Croix Town Homes
- 26.) 1901 Bopf Street
- 27.) The Glenderry
- 28.) Red Cedar Estates
- 29.) The Villas at Paperjack Creek
- 30.) Garden View Apartments
- 31.) Brookview I
- 32.) Brookview II
- 33.) Rothchild Apartments Marathon cty. - HUD
- 34.) Sedgemoor
- 35.) Historic Manitowoc Place
- 36.) Sunset Manor

- 37.) Ponderosa I & II/marathon cty. RD
- 38.) Boulder Ridge
- 39.) Highpointe Commons
- 40.) Bayfield County Housing Redevelopment-RD
- 41.) Bay Ridge Villa I
- 42.) New York Apartments
- 43.) Prairie View Apartments
- 44.) The Oaks of Dunn Co, Inc.
- 45.) Uplands Apartments
- 46.) Chippewa Senior Hsg. (Homestead Village I)
- 47.) Lincolnwood Glen Senior Living
- 48.) Arbor Glen (Evansville Senior)
- 50.) Wausau North/Diamond View
- 51.) Randolph II/Diamonds Edge
- 52.) Historic West Elementary
- 53.) Windmill Place
- 54.) Whitehall Housing Redevelopment
- 55.) St. Peters
- 56.) Neillsville 1/ Pine-Court Terrace
- 57.) Neillsville I Manor
- 58.) Mission Village Menasha
- 59.) Fond du lac Townhomes
- 60.) Vista Valley Apts
- 61.) Redwood Terrace
- 62.) Lynndale Village
- 63.) Craftsman Village Townhomes - Plover
- 64.) Mission Village of Sheboygan
- 65.) Eagle Pines
- 66.) Indianhead Cottages
- 67.) Pleasant View Townhomes
- 68.) Jefferson Street Apartments
- 69.) Historic Lincoln School
- 70.) Union Square Apartments
- 71.) Elementary School Apartments
- 72.) Winfield Park
- 73.) Mission Village of Dodgeville
- 74.) Lawler
- 75.) Beacon Avenue Cottages
- 76.) Prairie Haus
- 77.) Horicon School Apartments
- 78.) Spartan Lofts
- 79.) Hammond Homes
- 80.) Fairchild Sr Living
- 81.) Sunrise Meadow II
- 82.) Brodhead Senior Village
- 83.) Community Housing Project #1
- 84.) Lancaster Senior Village
- 85.) Community Housing Project #4
- 86.) Havenwood RCAC
- 87.) Community Housing Project: Bitters Avenue
- 88.) Valley Vista/ Valley Villas
- 89.) Community Housing Project #6
- 90.) Community Housing Project #7

- 91.) Chippewa Senior Housing/Homestead Village
- 92.) Heritage House Apartments
- 93.) Community Housing Project-Collins
- 94.) Village on the Water/ The Village on Water
- 95.) Parkview
- 96.) King St. I
- 97.) Dancing Oaks Cottages
- 98.) King St. II
- 99.) King St. III
- 100.) Abbey Grove
- 101.) The 1300, LLC
- 102.) Trolley Station Terrace
- 103.) Dakota Meadows
- 104.) Cottages On Main

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

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

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

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

\$4,893,834 of new HOME program income was receipted into IDIS for the 2021 program year. No HOME-RHD projects were funded using program income in PY 21.

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

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

The HOME-RHD program routinely coordinates with WHEDA (Wisconsin's LIHTC-dispersing entity) to fund construction of new affordable housing stock and rehabilitate existing affordable housing stock. There are currently over 80 active projects in Wisconsin that contain both HOME and LIHTC funding.



## CR-55 HOPWA (HOPWA GRANTEES ONLY)

Number of Households Served Through	One-year Goal	Actual
Short-term rent, mortgage and utility assistance to prevent homelessness of the individual or family	131	79
Tenant-based rental assistance	0	0
Units provided in permanent housing facilities developed, leased or operated with HOPWA funds	0	0
Units provided in transitional short-term housing facilities developed, leased or operated with HOPWA funds	0	0
<b>Total</b>	131	79

**Table 14 – HOPWA Number of Households Served**

The HOPWA program only partially met the anticipated outcomes for this reporting period. Fewer individuals required short-term rent, mortgage, and utility (STRMU) assistance to prevent homelessness than expected. Vivent Health has been able to maintain access to services for HOPWA clients with no waitlist, which demonstrates the high prioritization of the vulnerable HIV/AIDS population served through STRMU.

STRMU assistance has provided stable housing for the vulnerable HIV/AIDS population. Of the 79 households receiving STRMU assistance, 68 of those households have been recognized as stable and are unlikely to require additional housing assistance in the future. This is a reflection of the effectiveness of STRMU assistance, housing interventions performed by Vivent Health housing teams, and efforts to maintain collaboration with partnering organizations.

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

The Wisconsin Housing and Economic Development Authority (WHEDA) submitted the 2021 allocation plan, which outlined the goal of creating 146 units through the Housing Trust Fund program for the extremely low-income.

Throughout the year, WHEDA conducted two competitive rounds of applications for the allocation of Housing Trust Funds. One in May 2021, the other in September, 2021.

In May, four Housing Tax Credit recipients submitted applications for an allocation of Housing Trust Funds. Three applications were fully awarded, and one was partially awarded. This accounted for what will be the eventual creation of 171 units of affordable housing – with 48 of those targeted towards the extremely low-income population and identifying as Housing Trust Fund units. One project is currently under construction and the remaining two projects are working toward financial closing. In September, four Housing Tax Credit recipients submitted applications for an allocation of Housing Trust Funds. One application was fully awarded. This project will result in 32 new units of supportive housing.

Tenure Type	0-30% AMI	0% of 30+ to poverty line	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
<b>Rental</b>	19	0	22	92	0	92
<b>Homebuyer</b>						

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

### ESG Supplement to the 2021 CAPER

#### 1. Recipient Information—All Recipients Complete

##### Basic Grant Information

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

##### ESG Contact Name

Prefix	Ms.
First Name	Susan
Middle Name	0
Last Name	Brown
Suffix	0
Title	Administrator

##### ESG Contact Address

Street Address 1	101 E. Wilson St., 9th Floor
Street Address 2	0
City	Madison
State	WI
ZIP Code	-
Phone Number	(608) 266-7531
Extension	0
Fax Number	0
Email Address	Susan.Brown@wisconsin.gov

##### ESG Secondary Contact

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

#### 2. Reporting Period—All Recipients Complete

Program Year Start Date	04/01/2020
Program Year End Date	03/31/2021

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

**Subrecipient or Contractor Name:** WEST CENTRAL WI COMMUNITY ACTION AGENCY, INC

**City:** Glenwood City

**State:** WI

**Zip Code:** 54013, 8556

**DUNS Number:** 030016844

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 189,860

**Subrecipient or Contractor Name:** COMMUNITY ACTION COALITION OF SOUTH CENTRAL WISCONSIN

**City:** Madison

**State:** WI

**Zip Code:** 53704, 2605

**DUNS Number:** 07895681

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 87,750

**Subrecipient or Contractor Name:** HOMELESS ASSISTANCE LEADERSHIP ORGANIZATION

**City:** Racine

**State:** WI

**Zip Code:** 53403

**DUNS Number:** 197567089

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 131,790

**Subrecipient or Contractor Name:** ADVOCAP INC.

**City:** Fond Du Lac

**State:** WI

**Zip Code:** 54935, 4122

**DUNS Number:** 078934148

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 156,190

**Subrecipient or Contractor Name:** NORTH CENTRAL CAP INC

**City:** Wisconsin Rapids

**State:** WI

**Zip Code:** 54495, 1141

**DUNS Number:** 096826086

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 116,910

**Subrecipient or Contractor Name:** RENEWAL UNLIMITED INC.

**City:** Portage

**State:** WI

**Zip Code:** 53901, 3400

**DUNS Number:** 099140790

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 111,300

**Subrecipient or Contractor Name:** WESTERN DAIRYLAND ECONOMIC OPPORTUNITY COUNCIL

**City:** Independence

**State:** WI

**Zip Code:** 54747, 0125

**DUNS Number:** 084490762

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 168,350

**Subrecipient or Contractor Name:** NEWCAP, INC.

**City:** Oconto

**State:** WI

**Zip Code:** 54153, 1541

**DUNS Number:** 136478786

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 142,440

**Subrecipient or Contractor Name:** FAMILY PROMISE OF OZAUKEE COUNTY

**City:** Port Washington

**State:** WI

**Zip Code:** 53074

**DUNS Number:** 059578735

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 73,890

**Subrecipient or Contractor Name:** MADISON, CITY OF

**City:** Madison

**State:** WI

**Zip Code:** 53701, 2983

**DUNS Number:** 076147909

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 400,000

**Subrecipient or Contractor Name:** KENOSHA HUMAN DEVELOPMENT SERVICES, INC.

**City:** Kenosha

**State:** WI

**Zip Code:** 53140, 3715

**DUNS Number:** 080500861

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 118,300

**Subrecipient or Contractor Name:** NORTHWEST WI CSA, INC.

**City:** Superior

**State:** WI

**Zip Code:** 54880, 1523

**DUNS Number:** 153452248

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 65,623

**Subrecipient or Contractor Name:** SOUTHWEST CAP

**City:** Dodgeville

**State:** WI

**Zip Code:** 53533, 1545

**DUNS Number:** 080507437

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 102,890

**Subrecipient or Contractor Name:** YWCA – OF THE COULEE REGION

**City:** La Crosse

**State:** WI

**Zip Code:** 54603, 1755

**DUNS Number:** 941006900

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 171,160

**Subrecipient or Contractor Name:** YWCA ROCK COUNTY

**City:** Janesville

**State:** WI

**Zip Code:** 53546, 6203

**DUNS Number:** 556432995

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 157,130

**Subrecipient or Contractor Name:** LAKESHORE CAP, INC.  
**City:** Manitowoc  
**State:** WI  
**Zip Code:** 54220, 4034  
**DUNS Number:** 611777327  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 111,110

**Subrecipient or Contractor Name:** APPLETON, CITY  
**City:** Appleton  
**State:** WI  
**Zip Code:** 54911, 4702  
**DUNS Number:** 053090312  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Unit of Government  
**ESG Subgrant or Contract Award Amount:** 143,100

**Subrecipient or Contractor Name:** THE SALVATION ARMY OF BURNETT COUNTY, WI  
**City:** Siren  
**State:** WI  
**Zip Code:** 54872, 8042  
**DUNS Number:** 150777253  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Faith-Based Organization  
**ESG Subgrant or Contract Award Amount:** 78,670

**Subrecipient or Contractor Name:** THE SALVATION ARMY OF STEVENS POINT, WI  
**City:** Stevens Point  
**State:** WI  
**Zip Code:** 54481, 3050  
**DUNS Number:** 150777253  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Faith-Based Organization  
**ESG Subgrant or Contract Award Amount:** 65,920

**Subrecipient or Contractor Name:** House of Hope, Inc.  
**City:** Green Bay  
**State:** WI  
**Zip Code:** 54303, 2665  
**DUNS Number:** 618259688  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 208,700

**Subrecipient or Contractor Name:** FAMILY PROMISE OF WASHINGTON COUNTY  
**City:** West Bend  
**State:** WI  
**Zip Code:** 53095  
**DUNS Number:** 961923401  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 100,080

**Subrecipient or Contractor Name:** COMMUNITY DEVELOPMENT GRANTS ADMINISTRATION  
GR1535312601  
**City:** Milwaukee  
**State:** WI  
**Zip Code:** 53202, 3515  
**DUNS Number:** 006434211  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Unit of Government  
**ESG Subgrant or Contract Award Amount:** 400,000

**Subrecipient or Contractor Name:** Housing Action Coalition of Waukesha County, Inc.  
**City:** Waukesha  
**State:** WI  
**Zip Code:** 53186  
**DUNS Number:** 006959488  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 117,850

## CR-65 ESG PERSONS ASSISTED (ESG RECIPIENTS ONLY)

This requirement is replaced by the SAGE System requirement.

**8. Shelter Utilization**

	Number of Units
Number of New Units - Rehabbed	-
Number of New Units - Conversion	-
Total Number of bed-nights available	1,974,285
Total Number of bed-nights provided	695,624
Capacity Utilization	35.23%

**Table 15 – Shelter Utilization**

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

Emergency Solutions Grant (ESG) funding was distributed using a formula incorporating need and performance data, with a goal of rewarding those who are best aligning their homeless service systems towards preventing and ending homelessness. Information describing the proposed formula measures was sent to the leadership of the four Wisconsin HUD Continua of Care for feedback. The formula distributes funding among predetermined county groupings based on historical partnership for previous grant competitions, the HUD Continuum of Care process, and geographic proximity. The formula is comprised of HMIS data describing homelessness, an average of monthly census counts, and HUD system performance measures.

The two HUD system performance measures used this year are:

- successful placement in or retention of permanent housing
- reoccurrence to homelessness

Applicants were also required to use performance data when distributing funds at the local level, and they came up with a plan for improving local system performance.

## CR-75 ESG EXPENDITURES (ESG RECIPIENTS ONLY)

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year			
	2018	2019	2020	2021
Expenditures for Rental Assistance	80,654	105,103	88,314	25,508
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			250	550
Expenditures for Housing Relocation & Stabilization Services - Services	123,534	88,502	112,628	53,711
Expenditures for Homeless Prevention under Emergency Shelter Grants Program				
<b>Subtotal Homelessness Prevention</b>	<b>204,188</b>	<b>193,605</b>	<b>201,192</b>	<b>79,769</b>

**Table 16 – ESG Expenditures for Homelessness Prevention**

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year			
	2018	2019	2020	2021
Expenditures for Rental Assistance	765,664	653,445	627,788	479,232
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			41,456	92,931
Expenditures for Housing Relocation & Stabilization Services - Services	677,443	485,605	562,344	381,643
Expenditures for Homeless Assistance under Emergency Shelter Grants Program				
<b>Subtotal Rapid Re-Housing</b>	<b>1,443,107</b>	<b>1,139,050</b>	<b>1,231,588</b>	<b>953,806</b>

**Table 17 – ESG Expenditures for Rapid Re-Housing**

#### 11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year			
	2018	2019	2020	2021
Essential Services	708,344	745,287	760,692	674,325
Operations	666,683	755,201	757,092	529,753
Renovation				
Major Rehab				
Conversion				
<b>Subtotal</b>	<b>1,375,027</b>	<b>1,500,488</b>	<b>1,517,784</b>	<b>1,204,078</b>

**Table 18 – ESG Expenditures for Emergency Shelter**

### 11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year			
	2018	2019	2020	2021
HMIS	147,008	168,770	161,192	163,915
Administration	110,687	113,104	112,133	82,149
Street Outreach	92,396	153,938	119,875	108,475

**Table 19 - Other Grant Expenditures**

### 11e. Total ESG Grant Funds

Total ESG Funds Expended	2019	2020	2021
	\$3,558,666	\$3,689,748	\$2,592,192

**Table 20 - Total ESG Grant Funds**

### 11f. Match Source

	2019	2020	2021
Other Non-ESG HUD Funds	201,812	332,971	615,735
Other Federal Funds	248,630	437,305	228,518
State Government	1,515,000	831,961	847,313
Local Government	349,668	228,833	319,596
Private Funds	1,107,442	785,505	925,995
Other	987,383	1,018,072	552,062
Fees	6,888	7,350	1,225
Program Income	2,450		545
<b>Total Match Amount</b>	<b>4,419,273</b>	<b>3,641,997</b>	<b>3,490,989</b>

**Table 21 - Other Funds Expended on Eligible ESG Activities**

### 11g. Total

Total Amount of Funds Expended on ESG Activities	2019	2020	2021
	\$7,688,227	\$6,678,602	\$6,083,180

**Table 22 - Total Amount of Funds Expended on ESG Activities**

## ADDITIONAL ACCOMPLISHMENTS REPORTING