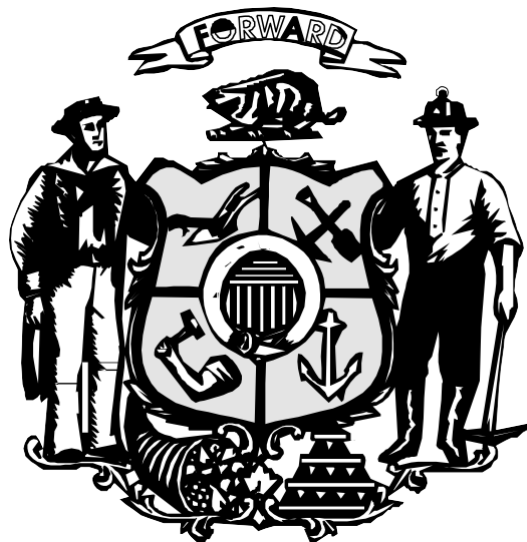


STATE OF WISCONSIN

2025-2029 Consolidated Plan

FINAL



*State of Wisconsin • Tony Evers, Governor,
Dept of Administration • Kathy Blumenfeld,
Secretary, Division of Energy, Housing and
Community Resources • David Pawlisch,
Administrator*

Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The Wisconsin 2025-2029 Consolidated Plan, developed by the Department of Administration's Division of Energy, Housing and Community Resources (DEHCR), details the Division's overall strategy for addressing housing, community, homelessness, and economic development needs. The focus of the activities and strategies described in this Consolidated Plan is on the evolving needs of low- and moderate-income people, including addressing local resiliency and improving access to broadband internet. A central theme throughout this Plan is the development of strategies offering flexibility, responsiveness, and accountability. The Wisconsin 2025-2029 Consolidated Plan defines how the Division of Energy, Housing and Community Resources will distribute grant funds to local governments, public and private organizations, and businesses. The majority of these funds are U.S. Department of Housing and Urban Development (HUD) formula grants for:

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

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

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

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

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

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

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

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

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

3. Evaluation of past performance

The Division of Energy, Housing and Community Resources will continue to build upon the progress made over the past 5 years to increase the number of affordable and accessible housing units and to contribute to the economic sustainability of communities across the state. The Division will continue to

support program activities which have proven to be effective while also looking for areas where the efficiency or impact of these programs can be improved.

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

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

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

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

1. Capitalization of the RLF took place before January 1, 1992, and
2. The State has closed out the source grant from which funds were originally used to capitalize the RLF, and
3. HUD has closed out the CDBG grant between HUD and the State for the original source year that capitalized the RLF.

4. Summary of citizen participation process and consultation process

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

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

After development, and in accordance with its Citizen Participation Plan, the Division of Energy, Housing and Community Resources held a public hearing on May 29, 2025 and a 30-day public comment period ending June 28, 2025.

5. Summary of public comments

Not available at this time.

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

Not available at this time.

7. Summary

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

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

CDBG-Housing Revolving Loan Funds (RLF) to remit all program income to the Department annually to capitalize CDBG-Conversion grants. Certain UGLG's that currently administer CDBG- Housing Revolving Loan Funds are required to annually remit program income to the Department.

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

The Process

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

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

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

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

Mr. David Pawlisch, Administrator, Division of Energy, Housing and Community Resources

Wisconsin Department of Administration

101 E. Wilson St. P.O. Box 7970

Madison, WI 53707-7970

(608) 267-0770/ (608) 266-5381 (FAX)

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

1. Introduction

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

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

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

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

DEHCR attended the 2024 "A Home for Everyone Conference". The conference had approximately 250 attendees and was held on August 13-14, 2024 in Wisconsin Dells, WI. DEHCR conversed with attendees and solicited input on its HUD-funded as well as State funded programs, award requirements, identified changes, potential updates and solicited input regarding the 2025-2029 Consolidated Plan.

DEHCR attended the 2024 Poverty Matters! Conference. The conference was held on October 9-10, 2024 in Sheboygan, WI. The Poverty Matters! Conference is committed to reducing poverty in communities in Wisconsin. DEHCR led multiple panel sessions which informed the Consolidated Plan's Needs Assessment and Market Analysis sections. DEHCR discussed program goals, participation requirements and allowable activities for multiple federal and state-funded programs.

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

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

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

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

The Division of Energy, Housing and Community Resources' Administrator and Bureau of Housing staff regularly attend Wisconsin CoC meetings and work closely with CoC staff to administer DEHCR programs. The Division solicited feedback specific to the 2025-2029 Consolidated Plan at the Wisconsin Balance of State CoC Quarterly Meeting held on February 18, 2024. DEHCR distributed its online public survey to all four Continua of Care in Wisconsin and attended conferences where CoCs were in attendance, specifically "A Home for Everyone Conference" and the "Poverty Matters!" conference. Wisconsin's CoCs were asked targeted questions related to homeless service delivery in the Partner and Stakeholder Letter. These responses informed the Homeless Needs Assessment and Market Analysis. DEHCR recognizes how the means of service delivery and the extent of homelessness differs across Wisconsin. The Division contracts with regional groupings of agencies (referred to as local continua) to administer the ESG program.

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

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

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

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table 3 – Other local / regional / federal planning efforts

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

The Division of Energy, Housing and Community Resources encouraged units of local government (UGLGs) to participate in the development of the Consolidated Plan. DEHCR sent email notifications to 1,900 units of local government, informing them of the online public survey and public input sessions, and encouraging them to submit feedback if they were unable to take the survey or attend the input sessions. DEHCR staff also solicited feedback from local government staff and local economic development corporation staff at the Wisconsin Economic Development Association’s Governor’s Conference on Economic Development held on January 31- February 2, 2024 held in Wisconsin Dells, WI. The Summit provides an opportunity to address the unique challenges and opportunities of blending community and economic development efforts to advance social outcomes. Participants included state and local government, tribal representatives, business owners, and others.

Narrative (optional):

PR-15 Citizen Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

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

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

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

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

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

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

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

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

Citizen Participation Outreach

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

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment details the State of Wisconsin's needs related to affordable housing, community development, and homelessness, which include: Housing Needs Assessment, Disproportionately Greater Need, Public Housing, Homeless Needs Assessment, Non-Homeless Special Needs Assessment, and Non-Housing Community Development needs.

NA-10 Housing Needs Assessment

- The most prevalent housing problems in Wisconsin are cost burden (households paying between 30-50% of their monthly income on housing) and severe cost burden (households paying more than 50% of their monthly income on housing), which are proportionally greater in the lowest income brackets and proportionally less frequent in the higher income brackets. This indicates a need for housing affordable at the lowest income levels. As Wisconsin's population is expected to continue to grow, with a large percentage of this growth among those aged 65 and older, there is also a need for affordable, accessible housing for this increasingly elderly population.
- Housing units are classified as having a housing problem if the unit:
 - Lacks complete kitchen facilities
 - Lacks complete plumbing facilities,
 - Is overcrowded (more than one person per room), and
 - Has a cost burden greater than 30% of the household's monthly income
- Housing units are classified as having a severe housing problem if the unit:
 - Lacks complete kitchen facilities
 - Lacks complete plumbing facilities
 - Is severely overcrowded (more than 1.5 person per room)
 - Has a severe cost burden greater than 50% of the household's monthly income
- Housing cost burdens are classified as:
 - No cost burden – households paying less than 30% of their monthly income on housing
 - Cost burden – households paying between 30-50% of their monthly income on housing
 - Severe cost burden – households paying more than 50% of their monthly income on housing

(continued text 1)

NA-15 – 30: Disproportionately Greater Need

- A disproportionately greater need exists when the members of a racial or ethnic group experience housing problems at a greater rate (10 percentage points or more) than the income level for the state as a whole. NA-15, NA-20, NA-25, and NA-30 discuss disproportionately greater need among groups experiencing housing problems, severe housing problems, and housing cost burdens.
- Using prepopulated data from the Comprehensive Housing Affordability Strategy as well as the American Community Survey, the Division of Energy, Housing and Community Resources found that there is a disproportionately greater need among:
- Housing problems
 - Hispanic (Extremely Low Income, Low Income)
 - Black/African American (Extremely Low Income, Low Income)
 - Pacific Islander (Extremely Low Income)
 - Asian (Moderate Income)
- Severe housing problems
 - Asian (Low Income, Moderate Income, Middle Income)
 - Pacific Islander (Extremely Low Income)
- Housing cost burdens
 - Black/African American
 - Hispanic

NA-35: Public Housing

- In Wisconsin, the Division of Housing does not directly administer public housing funds. A survey of the 120 Public Housing Authorities in Wisconsin and Wisconsin Housing and Economic Development Authority (WHEDA), revealed that in most cases, there is a long waiting list for public housing and housing vouchers.

NA-40: Homeless Needs Assessment

- According to January 2022's Point-in-Time Count, 4,775 persons were homeless in Wisconsin at a single point in time. Approximately % of the homeless population in Wisconsin is people experiencing chronic homelessness (651). Wisconsin has experienced a 1% increase in the number of homeless clients receiving services and shelter from HMIS participating agencies in Wisconsin from 2013 to 2021, from 27,556 to 27,895. Decreasing the rate of homelessness will

require investment in evidence-based practices aimed at housing all populations experiencing homelessness.

NA-45: Non-Homeless Special Needs Assessment

- Special needs populations in Wisconsin include elders, frail elders, persons with disabilities, persons with substance abuse disorders, and victims of domestic violence. When discussing special needs populations it must be recognized that people with disabilities have less access to resources as they are more likely to be un- or underemployed, that people living in poverty tend to have a higher incidence of disability, and that elderly populations are more prone to disability as prevalence of disability increases with age. For special needs populations, there is a need for housing, accessibility improvements that allow aging in place, supportive housing, and programs tailored to helping special needs populations stay in housing.
- Utilizing CDBG-Program Income from CDBG-Housing local Revolving Loan Funds for housing conversion projects may help address a lack of housing for these populations.

NA-50: Non-Housing Community Development Needs

As identified through an online public survey conducted by the Division of Energy, Housing and Community Resources to gather feedback for the Consolidated Plan, the top five perceived needs of community development projects are:

1. To address public infrastructure deficiencies such as storm sewers or streets.
2. To assist in building or rehab of fire stations, libraries, or other public facilities.
3. To support energy efficient design and retrofitting in public facilities.
4. To fund community development planning efforts that spur new investment.
5. To fund accessibility modifications such as wheelchair ramps in public facilities.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2015	Most Recent Year: 2022	% Change
Population	5,742,117	5,895,908	2%
Households	2,299,107	2,449,970	6.5%
Median Income	\$53,357.00	\$67,125.00	25%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2011-2015 ACS (Base Year) 2021 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	189,310	213,790	368,870	257,860	1,162,670
Small Family Households	36,470	50,304	103,063	91,165	586,860
Large Family Households	6,341	10,403	26,011	22,573	101,661
Household contains at least one person 62-74 years of age	49,029	58,175	115,940	79,275	307,702
Household contains at least one person age 75 or older	46,614	59,606	74,739	34,670	89,661
Households with one or more Children 6 years old or younger	14,069	21,114	47,556	38,546	113,068

Table 6 - Total Households Table

Data Source: 2017-2021 CHAS, CPD Maps

Housing Needs Summary Tables

1. Housing Problems Overview (Households with one of the listed needs)

Housing Problems Overview ¹	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	292,605	320,745	613,350
Household has none of 4 Housing Problems OR cost burden not available, no other problems	1,327,095	461,370	1,788,465
Total	1,619,705	782,115	2,401,820

Table 7 – Housing Problems Table

Data 2017-2021 CHAS

Source:

1. The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.

Table description

The above table shows the overall number of households with housing problems, broken up by tenure (renter or owner).

2. Income by Housing Problems

Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available, no other problems	Total
Household Income <= 30% HAMFI	215,565	55,890	271,455
Household Income >30% to <=50% HAMFI	183,670	99,345	283,015
Household Income >50% to <=80% HAMFI	128,125	294,075	422,195
Household Income >80% to <=100% HAMFI	38,825	238,375	277,200
Household Income >100% HAMFI	47,165	1,100,785	1,147,950
Total	613,350	1,788,465	2,401,820

Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available, no other problems	Total
Household Income <= 30% HAMFI	141,680	37,455	179,135
Household Income >30% to <=50% HAMFI	111,310	39,450	150,760
Household Income >50% to <=80% HAMFI	51,095	124,755	175,845
Household Income >80% to <=100% HAMFI	8,100	80,795	88,895
Household Income >100% HAMFI	8,560	178,915	187,475
Total	320,745	461,370	782,115

Income by Housing Problems (Owners only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available, no other problems	Total
Household Income <= 30% HAMFI	73,885	18,435	92,320
Household Income >30% to <=50% HAMFI	72,360	59,895	132,255
Household Income >50% to <=80% HAMFI	77,030	169,320	246,350
Household Income >80% to <=100% HAMFI	30,725	157,580	188,305
Household Income >100% HAMFI	38,605	921,870	960,475
Total	292,605	1,327,095	1,619,705

Data 2017-2021 CHAS
Source:

3. Cost Burden Overview

Housing Cost Burden Overview ³	Owner	Renter	Total
Cost Burden <=30%	1,336,765	466,355	1,803,120
Cost Burden >30% to <=50%	170,565	154,430	324,995
Cost Burden >50%	103,035	145,745	248,780
Cost Burden not available	9,335	15,585	24,920
Total	1,619,705	782,115	2,401,820

Table 8 – Cost Burden Overview

Data 2017-2021 CHAS
Source:

3. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

4. Cost Burden Detail

Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	212,585	167,065	271,455
Household Income >30% to <=50% HAMFI	178,395	56,710	283,015
Household Income >50% to <=80% HAMFI	116,615	17,450	422,195
Household Income >80% to <=100% HAMFI	33,265	4,350	277,200
Household Income >100% HAMFI	32,920	3,200	1,147,950
Total	573,780	248,780	2,401,820
Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	139,775	112,235	179,135
Household Income >30% to <=50% HAMFI	107,660	28,370	150,760
Household Income >50% to <=80% HAMFI	44,310	3,885	175,845
Household Income >80% to <=100% HAMFI	5,410	805	88,895
Household Income >100% HAMFI	3,020	450	187,475
Total	300,175	145,745	782,115
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	72,805	54,830	92,320
Household Income >30% to <=50% HAMFI	70,730	28,340	132,255
Household Income >50% to <=80% HAMFI	72,305	13,565	246,350
Household Income >80% to <=100% HAMFI	27,855	3,545	188,305
Household Income >100% HAMFI	29,905	2,755	960,475
Total	273,600	103,035	1,619,705

Table 9 – Cost Burden Detail

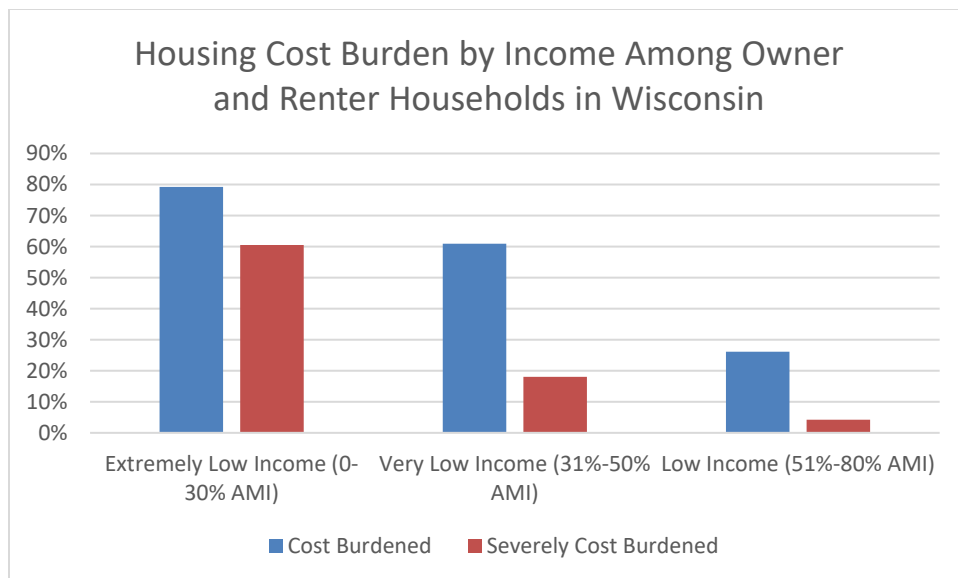
Data 2017-2021 CHAS
Source:

Table description

The preceding table summarizes households experiencing severe housing problems, broken down by income limits and housing tenure. Households are grouped based on the severity of housing cost burden.

Housing Cost Burden By Income Among Owner and Renter Households

The following chart illustrates the percentage of cost burdened and severely cost burdened households by income category. 76% of extremely low-income households are cost burdened, and 61% of extremely low-income households are severely cost burdened. The percentage of cost burdened households is lower among very low income and low-income households. This data indicated that there is a shortage of housing affordable to households earning less than 80% of AMI. This shortage of affordable housing is the most severe at the lowest income levels.



5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,107	2,925	3,751	3,285	11,068	835	1,598	3,892	1,113	7,438
Multiple, unrelated family households	0	205	610	480	1,295	380	60	236	80	756
Other, non-family households	277	0	704	0	981	120	112	0	84	316
Total need by Income	1,384	3,130	5,065	3,765	13,344	1,335	1,770	4,128	1,277	8,510

Table 10 – Crowding Information – 1/2

Data 2017-2021 CHAS, CPD Maps
Source:

Table description

The above table shows overcrowded households by tenure, income level, and housing type. The majority of overcrowding occurs in single family households. This indicates that families, as opposed to a single person or a couple, may have more trouble finding an affordable unit with enough bedrooms.

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 11 –
Crowding
Information –
2/2**

Describe the number and type of single person households in need of housing assistance.

Data describing the number of households experiencing housing problems can be found above and data describing the number of individuals experiencing homelessness can also be found in NA-40. 2021 American Community Survey has identified a total of 294,869 single person households in Wisconsin of which 35,990 households are identified as low-income.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

No comprehensive statewide estimate is available for the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking. 2021 American Community Survey has identified a total of 686,687 persons with a disability in Wisconsin. Further, persons identified with a disability have a median income of \$25,762 during that time period. Depending on location in Wisconsin and household size, that level of income would likely qualify for housing benefits. Substitute data and a further discussion of the needs of these population types can be found in NA-45.

What are the most common housing problems?

The most common housing problems experienced by both owners and renters are cost burden and severe cost burden. These problems are most prevalent among extremely low-income households, with 79% of the 296,705 extremely low-income households experiencing a cost burden and 61% experiencing a severe cost burden. Very low-income households also experience housing cost burdens at high rates, with 61% of very low-income households experiencing a cost burden and 18% experiencing a severe cost burden. Households paying over 30% of their income on housing costs may not have enough income left to cover other basic needs, such as food, transportation, and healthcare. This problem was emphasized by housing providers during DEHCR public input sessions. Providers were concerned that the combination of low incomes, low supply of available safe, sanitary housing is leading to high housing costs. This combination is making it difficult for low-income Wisconsinites to stay stably housed while meeting basic needs.

Are any populations/household types more affected than others by these problems?

Extremely low-income households are disproportionately affected by all housing problems. A higher percentage of this income group experiences a cost burden and severe cost burden (described above), as well as overcrowding, severe overcrowding, and a lack of complete kitchen and plumbing facilities. Incomes below 30% of area median income are often insufficient to afford safe and sanitary housing without assistance.

Families experienced cost burden and severe cost burden at higher levels than average in every income group. Once again, these problems are the most prevalent among extremely low-income families, with 87% of extremely low-income small families and 89% of extremely low-income large families experiencing a cost burden. 61% of very low-income families are experiencing a housing cost burden. Among low income families, 37% of large families are experiencing a cost burden. Families have a difficult time finding housing because of a shortage of affordable rental properties with enough bedrooms to accommodate a larger household size. Feedback received during public input sessions and the online public survey show that the need for units with three or more bedrooms is experienced in both urban and rural areas of the state. Further data describing this need can be found in MA-10.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

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

Families nearing the end of rapid re-housing assistance need sufficient income in order to afford rent after the rental subsidies end. Typical difficulties experienced by households include long waits for Social Security Income approvals, struggles with finding better-paying jobs, and having to depend on Temporary Assistance to Needy Families (TANF) funding. In addition, homeless providers have expressed that the loss of case management services experienced at the same time as the loss of rental subsidy can cause some families to struggle with financial management and day-to-day activities, leading to a crisis situation. Providers continue to focus on finding sufficient income for families during the program so that they can maintain housing stability after its end. To help alleviate the lack of rental housing assistance, DEHCR has increased the funding for and number of providers offering TBRA assistance. In 2024, DEHCR assisted 608 households with Tenant-Based Rental Assistance and/or Rapid Re-Housing Assistance.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Division of Energy, Housing and Community Resources uses the HUD Category 3 definition of homelessness to define those at risk of homelessness. The HUD Category 3 definition includes people who will imminently lose their primary residency within 14 days and lack the resources or support networks to remain in housing.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Cost-burdened, severely cost-burdened, overcrowding among large families and substandard living conditions especially among low-income and severely low-income renters are directly linked with housing instability and an increasing risk of homelessness. Low incomes and a lack of affordable housing often combine to create housing instability for individuals and families. It is important to note that the majority of low-income families never experience homelessness. Those who do experience homelessness have often just experienced a sudden loss of income, unexpected large household or medical expenses, or an eviction. They also tend to have higher rates of mental illness and alcohol and substance abuse.

If a household has experienced an eviction, doesn't have a stable source of income, or has poor credit, they may have a difficult time finding a landlord willing to rent to them. This can create a cycle of housing instability where the household, even once co-occurring issues are stabilized, still cannot find housing.

Discussion

Prepopulated Comprehensive Housing Affordability Strategy (CHAS) data, as identified above, makes it clear that the largest housing issues for both owners and renters are housing cost burden and severe housing cost burden. Related issues such as a lack of stable income, a lack of reliable transportation, and mental health issues can make it even more difficult for households to maintain stable housing. Many of the low-income households experiencing housing cost burdens do not have the ability to cover their basic needs, and do not have savings to pay for an unexpected expense. It is important to focus resources on increasing the amount of affordable housing in Wisconsin, due to the shortage described by housing providers and exhibited in the data. The greatest need exists at the very lowest income levels. In order to attain housing affordable to extremely low-income households, deep and likely permanent subsidies are needed. In addition, housing providers should focus on keeping individuals and families housed, in order to avoid the issues caused by a poor rental history.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The following analysis presents data on the number of households with housing problems in the State of Wisconsin and on the proportion of housing problems occurring among particular racial or ethnic groups. According to HUD's definition, a disproportionately greater number of housing problems exists when the members of a racial or ethnic group experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole (including all racial or ethnic groups). Households that have an income greater than the area median income (AMI) are not included in this analysis.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	434,285	55,890
White	151,835	25,240
Black / African American	34,035	7,820
Asian	5,425	1,985
American Indian, Alaska Native	2,045	975
Pacific Islander	10	0
Hispanic	16,710	2,880

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data 2017-2021 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table description

The table above shows that among extremely low-income households (0-30% area median income), 87% have one or more housing problems. There is a disproportionately greater need among extremely low-income African American households. The rate of housing problems among extremely low-income African American households is 82%, which is significantly greater than the jurisdiction as a whole.

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	183,670	99,345
White	146,120	91,325
Black / African American	20,415	6,360
Asian	3,425	1,240
American Indian, Alaska Native	1,155	1,585
Pacific Islander	35	20
Hispanic	14,680	3,725

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data 2017-2021 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table description

The table above shows that among low income households (30-50% area median income) in Wisconsin, 63.2% have one or more housing problems. There is a disproportionately greater need among low income Black/ African American households. The rate of housing problems among these Black/ African American households is 79.4%, which is 9.8% greater than the jurisdiction as a whole.

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	128,125	294,075
White	105,820	243,750
Black / African American	8,700	18,300
Asian	2,745	4,985
American Indian, Alaska Native	555	1,181
Pacific Islander	120	60
Hispanic	8,530	18,425

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data 2017-2021 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table description

The table above shows that among moderate income households (50-80% area median income) in Wisconsin, 37.3% have one or more housing problems. There is a disproportionately greater need among moderate income Pacific Islander households. The rate of housing problems among these households is 74.6%, which is double the jurisdiction as a whole.

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	38,825	238,375
White	33,665	206,255
Black / African American	1,690	10,090
Asian	385	4,605
American Indian, Alaska Native	885	1,975
Pacific Islander	30	0
Hispanic	1,300	12,030

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data 2017-2021 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table description

The table above shows that among middle income households (80-100% area median income) in the State of Wisconsin, 13.3% have one or more housing problems. There is a disproportionately greater need among middle income American Indian households. The rate of housing problems among these American Indian households is 150%, which is five times greater than the jurisdiction as a whole.

Discussion

Below is a summary of racial or ethnic groups within the State of Wisconsin with disproportionately greater housing problems according to the CHAS pre-populated data:

Among Extremely Low-Income Households (0-30% AMI):

- The rate of housing problems among extremely low- income African American households is 82%, which is significantly greater than the jurisdiction as a whole.

The rate of housing problems among extremely low- income African American households is 82%, which is significantly greater than the jurisdiction as a whole. *Among Low Income Households (30-50% AMI):*

- The rate of housing problems among these Black/ African American households is 73.4%, which is 9.8% greater than the jurisdiction as a whole.
- The rate of housing problems among extremely low- income African American households is 82%, which is significantly greater than the jurisdiction as a whole. *Among Moderate Income Households (50-80% AMI):*
- There is a disproportionately greater need among moderate income Pacific Islander households. The rate of housing problems among these households is 74.6%, which is double the jurisdiction as a whole.
- Pacific Islanders make up an estimated 0.03% of all moderate-income households with housing problems in Wisconsin.

Among Middle Income Households (80-100% AMI):

- The rate of housing problems among these Pacific Islander households is 150%, which is five times greater than the jurisdiction as a whole.
- Pacific Islanders make up an estimated 0.03% of all extremely low-income households with housing problems in Wisconsin.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The following analysis presents data on the number of households with severe housing problems in the State of Wisconsin, and on the proportion of severe housing problems occurring among particular racial or ethnic groups. According to HUD's definition, a disproportionately greater need exists when the members of a racial or ethnic group experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Households which have an income greater than the area median income for Wisconsin are not included in this needs analysis of severe housing problems.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	172,965	98,480
White	119,690	73,085
Black / African American	30,930	13,160
Asian	4,720	2,685
American Indian, Alaska Native	1,560	1,470
Pacific Islander	4	4
Hispanic	13,665	6,935

Table 16 – Severe Housing Problems 0 - 30% AMI

Data 2017-2021 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table description

The above table shows that among extremely low-income households (0-30% area median income) in the State of Wisconsin, 62.8% have one or more severe housing problems. There is a disproportionately greater need among extremely low-income Hispanic households. The rate of severe housing problems among these Hispanic households is 91.4%, which is 27.6% greater than the jurisdiction as a whole.

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	67,320	215,695
White	52,565	170,635
Black / African American	5,850	20,920
Asian	1,615	3,055
American Indian, Alaska Native	310	1,880
Pacific Islander	35	20
Hispanic	5,270	15,310

Table 17 – Severe Housing Problems 30 - 50% AMI

Data 2017-2021 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table description

- The above table shows that among low-income households (30%-50% area median income) in Wisconsin, 22% have one or more severe housing problems. There is a disproportionately greater need among low-income Pacific Islander households. The rate of housing problems among these Pacific Islander households is 45%, which is double the jurisdiction as a whole. It should be noted that Pacific Islanders make up an estimated 0.03% of all low-income households with housing problems in Wisconsin.

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	30,455	391,740
White	23,605	326,057
Black / African American	1,815	25,185
Asian	1,445	6,470
American Indian, Alaska Native	145	2,895
Pacific Islander	45	135
Hispanic	2,980	23,575

Table 18 – Severe Housing Problems 50 - 80% AMI

Data 2017-2021 CHAS
Source:

*The four severe housing problems included in the definition of disproportionately greater number of severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table description

The above table shows that among moderate-income households (50-80% area median income) in Wisconsin, 7.2% have one or more severe housing problems. There is a disproportionately greater need among moderate-income Pacific Islander households. The rate of housing problems among these Pacific Islander households is 48.1%, which is almost 40% greater than the jurisdiction as a whole. It should be noted that Pacific Islanders make up an estimated 0.03% of all moderate-income households with housing problems in Wisconsin.

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	10,365	266,835
White	7,510	232,405
Black / African American	745	11,030
Asian	810	5,065
American Indian, Alaska Native	205	1,545
Pacific Islander	0	55
Hispanic	755	12,570

Table 19 – Severe Housing Problems 80 - 100% AMI

Data 2017-2021 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table description

The above table shows that among middle-income households (80-100% area median income) in Wisconsin, 3.4% have one or more severe housing problems. There is a disproportionately greater need among middle-income Pacific Islander households. The rate of housing problems among these Pacific Islander households is 23.1%, which is 20.3% greater than the jurisdiction as a whole. It should be noted that Pacific Islanders make up an estimated 0.03% of all middle-income households with housing problems in Wisconsin.

Discussion

Based on the CHAS pre-populated data from HUD, DEHCR has summarized the racial or ethnic groups within the State of Wisconsin with disproportionately greater severe housing problems:

Among Extremely Low-Income Households (0-30% AMI):

There is a disproportionately greater need among extremely low-income Hispanic households. The rate of severe housing problems among these Hispanic households is 87.4%, which is 24.6% greater than the jurisdiction as a whole. *Among Low-Income Households (30-50% AMI):*

There is a disproportionately greater need among low-income Pacific Islander households. The rate of housing problems among these Pacific Islander households is 44%, which is double the jurisdiction as a whole. It should be noted that Pacific Islanders make up an estimated 0.03% of all low-income households with housing problems in Wisconsin. *Among Moderate-Income Households (50-80% AMI):*

- There is a disproportionately greater need among moderate-income Pacific Islander households. The rate of housing problems among these Pacific Islander households is 48.1%, which is almost 40% greater than the jurisdiction as a whole. It should be noted that Pacific Islanders make up an estimated 0.03% of all moderate-income households with housing problems in Wisconsin.

Among Middle Income Households (80-100% AMI):

- There is a disproportionately greater need among middle-income Pacific Islander households. The rate of housing problems among these Pacific Islander households is 23.1%, which is 20.3% greater than the jurisdiction as a whole. It should be noted that Pacific Islanders make up an estimated 0.03% of all middle-income households with housing problems in Wisconsin.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The following analysis presents data on the number of households with cost burdens in Wisconsin and on the proportion of households with cost burdens occurring among particular racial or ethnic groups. According to HUD's definition, a disproportionately greater number of cost-burdened households exists when the members of a racial or ethnic group experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Cost burden is classified as follows:

- No Cost Burden: Households paying less than 30% of monthly income for housing;
- Cost Burden: Households paying between 30-50% of monthly income for housing;
- Severe Cost Burden: Households paying above 50% of monthly income for housing.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,773,575	318,895	242,719	24,205
White	1,581,735	261,200	185,505	16,535
Black / African American	66,105	29,755	33,310	4,025
Asian	37,965	5,610	5,725	1,695
American Indian, Alaska Native	11,105	1,890	1,640	355
Pacific Islander	500	115	4	0
Hispanic	76,165	20,325	16,535	1,595

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2017-2021 CHAS

Table description

The table above depicts cost burdened (30-50% of income) households by racial or ethnic groups; it shows that no group in Wisconsin experiences a disproportionately greater need.

Discussion

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

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

This section summarizes, by racial and ethnic group, disproportionately greater housing needs identified in the previous sections. Below is a summary table displaying where disproportionately greater housing problems have been found among identified racial or ethnic groups within a given income range. The rate of housing problems and severe housing problems for all households in Wisconsin is listed in the top row, with the total number of households given in parentheses. Disproportionately greater housing problems are identified in red. Each subsequent row identifies a racial or ethnic group and gives the percentage point increase or decrease from the jurisdiction's total percentage of housing problems, as well as the total number of households listed in parentheses. For example, in the State of Wisconsin, 81.8% of extremely low-income households (0-30% AMI) have housing problems, but extremely low-income Pacific Islander households experience housing problems at a rate of 18.2% greater than the State's extremely low-income households. It should be noted that the total number of extremely low-income Pacific Islander households with housing problems is 64 whereas the total number of extremely low-income households in the State of Wisconsin is 213,972.

Disproportionately Greater Need by Racial or Ethnic Group

	Extremely Low Income		Low Income		Moderate Income		Middle Income	
	0-30% AMI		30-50% AMI		50-80% AMI		80-100% AMI	
	Housing Problems	Severe Housing Problems	Housing Problems	Severe Housing Problems	Housing Problems	Severe Housing Problems	Housing Problems	Severe Housing Problems
State of Wisconsin	77.38%	62.84%	65.66%	23.19%	37.30%	7.20%	13.30%	3.50%
	210,060	170,569	185,830	65,645	126,470	30,035	37,955	10,025
White	-5.10%	-7.21%	27.00%	-5.27%	31.62%	6.75%	9.94%	13.93%
	151,835	119,690	146,120	52,565	105,820	23,605	33,665	7,510
Black/ African American	16.20%	18.13%	10.20%	8.91%	6.88%	6.04%	4.45%	7.43%
	34,035	30,930	20,415	5,850	8,700	1,815	1,690	745
Asian	2.58%	2.77%	10.20%	2.46%	2.17%	4.81%	1.01%	8.08%
	5,425	4,720	3,425	1,615	2,745	1,445	385	810
American Indian, Alaska Native	12.11%	9.83%	21.30%	19.33%	15.87%	1.20%	42.10%	2.30%
	2,045	1,560	1,155	310	555	145	885	205
Pacific Islander	9.14%	10.33%	3.30%	12.89%	43.58%	28.36%	28.30%	0.00%
	10	4	35	35	120	45	30	0
Hispanic	7.95%	8.01%	7.90%	8.03%	6.74%	9.92%	3.43%	7.53%
	16,710	13,665	14,680	5,270	8,530	2,980	1,300	755

White Households

Based on this CHAS data, there is a disproportionately greater housing need for middle income (80-100% AMI) white households. The rate of severe housing problems among all middle-income

households is 3.5%. For white households, the rate is 13.93% or 10% greater than the population as a whole.

Black/ African American Households

There is a disproportionately greater housing need for extremely low (0-30%AMI) and middle income (80-100% AMI) Black/ African American households. The rate of housing problems among extremely-low income Black/ African American households exceeds that of their relative share of the population. The rate of housing problems among all middle-income households is 3.5%. For Black/ African American households, the rate is 73.43% or 4.0% greater than the population as a whole.

When the comparison is changed from severe housing problems to housing problems for middle-income Black/ African American households, there is no longer a finding of disproportionately greater need. Housing problems among low income Black/ African American households are higher by percentage than all other low-income households in Wisconsin.

Black/ African American households have a disproportionately greater need for housing, but this need is not consistent among all income ranges and/or for specific types of problems. This does not necessarily reflect a persistent level of disproportionately greater need for all Black/ African American households across all types of housing problems.

Data describing the housing needs of Black/ African American households includes all households in both CDBG entitlement and non-entitlement areas. Black/ African American households are the largest minority racial or ethnic group in Wisconsin, comprising 6.12% of Wisconsin's population. The racial composition of the population in the non-entitlement areas (i.e. the rural areas and small cities served by DEHCR's CDBG program) is only 0.88% Black/ African American. Black/ African American households are congregated in larger urban areas; thus, the findings of disproportionately greater housing needs are likely largely a reflection of the condition in the entitlement areas. HUD has not provided data on housing problems by racial or ethnic groups controlling for only the non-entitlement areas.

Asian Households

Based on this CHAS data, Asian households are not disproportionately affected by housing problems.

No finding of disproportionately greater need exists when examining the percentage of cost burdened and severely cost burdened Asian households (across all income ranges).

While it is not possible to precisely identify the exact nature of the housing needs among Asian households, several observations can be made. If the disproportionately greater housing need among Asian households was an issue of substandard housing (lack of kitchen or plumbing facilities) DEHCR would expect to identify this need primarily among the lowest income households. Instead, data indicates that the most consistent findings of disproportionately greater housing need occur among the middle income ranges. If the issue of housing need was one of cost burden, DEHCR would expect to see a finding of disproportionately greater cost burden among Asian households across all income ranges. However, there is no finding of disproportionately greater cost burden or severe cost burden among these households (see section NA-25). A possible explanation of the data is that the disproportionately greater housing need among Asian households arises from overcrowding (>1 person per room) and severe overcrowding (>1.5 persons per room). It is possible that a higher percentage of Asian households tend to be overcrowded even at moderate- and middle-income ranges than the population as a whole.

Overcrowding (>1 person per room) by Racial and Ethnic Groups

Overcrowded units (>1 persons per room)	White	Black/ African American	Hispanic/ Latino	Asian	American Indian /Alaska Native	Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race
Total units	2,080,701	134,124	122,702	53,809	14,724	789	121,874	44,579
Overcrowded units	21,532	5,600	9,846	5,848	965	196	6,509	3,421
% Overcrowded	1.0%	4.2%	8.0%	10.9%	6.6%	24.8	5.3%	7.7%

Data Source: 2021 ACS

Though overcrowding among racial and ethnic groups is high for Asian households at 10.9%, this is a decrease from the 2010-12 American Community Survey when overcrowding among Asian households was 11.3%, and from the 2005-07 American Community Survey when it was 12.6%.

American Indian, Alaska Native Households

There are no findings of disproportionately greater housing need from the HUD provided Comprehensive Housing Affordability Study data for American Indian, Alaska Native households. American Indian, Alaska Natives have some of the lowest percentage of households with housing problems out of all racial and ethnic groups.

Pacific Islander Households

The percentage of Pacific Islander households with housing problems is disproportionately greater (18.2%) than that of all other ethnicity households in Wisconsin. The percentage of households with severe housing problems, among all Pacific Islander households exceeds the state average. The total number of Pacific Islander households living in Wisconsin is extremely small. There are only 20 extremely low-income Pacific Islander households in all of Wisconsin. More attention clearly needs to be provided to Pacific Islander households in Wisconsin, given their overwhelming over-representation with housing problems and severe housing problems.

Hispanic Households

There are no findings of disproportionately greater housing need among Hispanic households for Wisconsin. Data describing the housing needs of Hispanic households includes all households in both CDBG entitlement and non-entitlement areas. This is particularly important for this Consolidated Plan

because in the non-entitlement portion of the State (which excludes Dane, Milwaukee and Waukesha counties along with communities with populations over 50,000) the largest racial or ethnic minority are persons of Hispanic origin at 2.77%.

Wisconsin Population by Race for Non-entitlement Area (CDBG Grantee)

Race	Number	Percentage
White alone (not Hispanic)	2,735,621	85.34%
Black or African American alone (not Hispanic)	44,287	1.38%
American Indian and Alaska Native alone (not Hispanic)	26,793	0.84%
Asian alone (not Hispanic)	64,896	2.02%
Some other race alone (not Hispanic)	8,834	0.28%
Two or more races (not Hispanic)	115,099	3.59%
Persons of Hispanic Origin	210,153	6.56%
Total	3,205,683	

2020 Decennial Census

Looking back at historical census data it appears that while there were disproportionately greater housing needs among Hispanic households in previous decades, these differences have decreased across all income groups.

% of Greater Housing Problems Among Hispanic Households versus all Wisconsin Households

	2015-19		2011-15		2000	
	Hispanic Households	All Households	Hispanic Households	All Households	Hispanic Households	All Households
Extremely Low Income	46.84%	80.83%	92.5%	86.4%	82.7%	75.6%
Low Income	75.4%	63.2%	75.0%	67.8%	64.9%	54.4%
Moderate Income	9.6%	37.3%	40.4%	38.7%	37.6%	28.1%

Middle Income*	13.3%	3.9%	24.8%	24.7%	20.2%	8.6%
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*Middle Income for 2011-15 is defined as 80-100% AMI, for 2000 is defined as >80% AMI, for 1990 is defined as 81-95% AMI

The reason for the decrease in disproportionately greater housing need among Hispanic households appears to be the result of the increasing proportion of housing problems experienced by all other households (predominately White), and not that the percentage of Hispanic households with housing problems has decreased.

If they have needs not identified above, what are those needs?

Not applicable.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Not applicable as a state grantee.

NA-35 Public Housing – (Optional)

Introduction

In Wisconsin, the Division of Energy, Housing and Community Resources does not directly administer public housing funds. There are 123 Public Housing Authorities (PHAs) in the State of Wisconsin. Of the 123 Public Housing Authorities, 58 provide low rent units, 27 administer Housing Choice Vouchers (HCV), and 38 are combined low rent units and HCV's. The Division of Energy, Housing and Community Resources is responsible for non-entitlement Annual and 5-Year Public Housing Authority (PHA) Plan reviews, in which DEHCR ensures that the PHA Plan is consistent with the Consolidated Plan. Of the 123 Public Housing Authorities, 17 are within entitlement cities or counties and are therefore not required to submit a PHA Plan to DEHCR for review. At this time there are no Public Housing Authorities designated as "troubled". DEHCR is unaware of any PHA jurisdiction under requirement of a Section 504 Voluntary Compliance Agreement – meaning, DEHCR has not been made aware of a PHA which has received a complaint from an individual who has experienced disability discrimination under Section 504.

Wisconsin Housing and Economic Development Authority (WHEDA) serves as an administrator of Section 8 Voucher Program funds. Additional information regarding Section 8 funds as well as WHEDA's updated Annual and 5-Year Plan is available at <https://www.wheda.com/Voucher-Administration/>.

The Division of Energy, Housing and Community Resources conducted a Public Housing Survey which was sent to contacts at the 123 Wisconsin Public Housing Authorities. The survey was open from June 22nd, 2024 – October 4, 2024 and had 18 respondents (not all respondents answered every question). The Division of Energy, Housing and Community Resources used the results from the self-reporting PHA survey to answer the following questions. To the best of our ability, the data below (as well as in the other public housing sections in this Consolidated Plan) reflects all Public Housing Authorities in Wisconsin.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of unit vouchers in use	0	209	11,735	26,417	630	24,935	164	128	265

Table 21 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Table description

This table details the number of vouchers and units by public housing program type administered by Wisconsin's 123 Public Housing Authorities. This table uses HUD's prepopulated data collected by the Public and Indian Housing Information Center. The program types used in the table are defined below:

- **Certificate** – The Section 8 Rental Certificate program increases affordable housing choices by allowing very low-income families to choose privately owned rental housing. Families apply to a local PHA or administering governmental agency for a Section 8 certificate. The PHA pays the landlord the difference between 30% of the household's adjusted income and the unit's rent.
- **Mod-Rehab** – The moderate rehabilitation program provides project-based rental assistance for low-income families. Assistance is limited to properties previously rehabilitated pursuant to a housing assistance payments (HAP) contract between an owner and a PHA.
- **Public Housing** – The total number of units in developments operated by the Public Housing Authorities within the jurisdiction.
- **Vouchers:**
 - **Total** – The total number of Section 8 vouchers (project-based plus tenant-based) administered by the PHA.
 - **Project-based** – The total number of project-based Section 8 vouchers administered by the PHA.
 - **Tenant-based** – The total number of tenant-based Section 8 vouchers administered by the PHA.
- **Special Purpose Vouchers:**

- Veterans Affairs Supportive Housing – The HUD-Veterans Affairs Supportive Housing program combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA). The VA provides these services for participating veterans at VA medical centers and community-based outreach clinics.
- Family Unification Program – Family Unification Program funding is allocated through a competitive process; therefore, not all Public Housing Authorities administer the program.
- *Disabled – In this table, disabled includes non-elderly, mainstream 1-year, mainstream 5-year, and nursing home transition.

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers		Tenant - based	Special Purpose Voucher	
				Total	Project - based		Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	41	168	224	13	159	34	16
# of Elderly Program Participants (>62)	0	6	4,584	4,858	156	4,614	10	0
# of Disabled Families	0	26	3,417	8,755	268	8,046	91	17
# of Families requesting accessibility features	0	209	11,735	N/A	N/A	N/A	N/A	N/A
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Table description

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This table displays the characteristics of public housing residents – both those that inhabit public housing units and those who utilize Section 8 housing vouchers – by program housing type. This table uses HUD’s prepopulated data collected by the Public and Indian Housing Information Center.

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	117	7,980	15,022	366	14,141	96	67	232
Black/African American	0	81	3,215	10,570	226	10,056	63	58	31
Asian	0	3	383	427	20	369	0	1	1
American Indian/Alaska Native	0	8	146	374	17	347	4	2	1
Pacific Islander	0	0	11	24	1	22	1	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Table description

This table displays the racial composition of residents for each public housing program. This table uses HUD’s prepopulated data collected by the Public and Indian Housing Information Center.

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	19	359	1,429	27	1,364	5	11	7
Not Hispanic	0	190	11,376	24,988	603	23,571	159	117	258
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Table description

As HUD distinguishes between race and ethnicity, this table displays the ethnic composition of residents for each public housing. This table uses HUD's prepopulated data collected by the Public and Indian Housing Information Center.

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Public Housing Authorities were asked to report on the needs of public housing tenants and applicants in the Public Housing Survey. There were 18 responses; some Public Housing Authorities recorded multiple needs. The most cited concerns were:

- Need for affordable housing (17 respondents)
- Economic concerns or lack of jobs in the jurisdiction (8 respondents)
- Need for supportive services (17 respondents)
- Greater need for accessible units (3 respondents)
- Access to affordable and safe transportation (2 respondents)

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

There were 17 respondents to questions regarding waiting lists. Since only a portion of Wisconsin's Public Housing Authorities responded to the survey, it is important to note that the total number of persons on the waiting lists is an undercount. A summary of the status of waiting lists is below.

- 0 Public Housing Authorities reported having a problem of too many vacancies.
- 15 Public Housing Authorities reported having a waiting list for their public housing units. In total, they reported 515 families or individuals on their public housing unit waiting lists.
- 5 Public Housing Authorities reported having a waiting list for housing vouchers. In total, these 5 report having at least 338 families or individuals on the waiting list for housing vouchers.

The most immediate needs, according to the self-reporting Public Housing Survey conducted in October 2024 are:

- Need for affordable housing (17 respondents)
- Economic concerns or lack of jobs in the jurisdiction (8 respondents)
- Need for supportive services (17 respondents)
- Greater need for accessible units (3 respondents)
- Access to affordable and safe transportation (2 respondents)

How do these needs compare to the housing needs of the population at large

The needs of public housing residents and housing choice voucher holders are similar to the needs of the rest of the low-and moderate-income population in Wisconsin. Many of these needs stem from the same core issues: lack of available and affordable housing, lack of access to a range of services, low-incomes, unemployment, an aging housing stock, and an aging population.

Discussion:

In much of Wisconsin, the demand for public housing greatly overwhelms the existing public housing stock. This is evidenced in statewide lengthy PHA waiting lists as well as closed waiting lists. However, there are Public Housing Authorities in Wisconsin that have reported it as their goal in their PHA Plans to decrease unit vacancies. Certain Public Housing Authorities in Wisconsin do not meet the public housing demands of their jurisdiction. While this may be the case in certain jurisdictions, Public Housing Authorities with vacancies appear to be the exception whereas Public Housing Authorities with waiting lists are the norm.

When asked how the Division of Energy, Housing and Community Resources can support Public Housing Authorities in meeting the needs of individuals or families on the waiting lists, 18 Public Housing Authorities responded. Some of the 18 listed multiple needs, however, the top suggestions as to PHA's needs were:

- 9 mentioned a need for increased program funding – particularly capital investments,
- 2 noted a need for increased funding for administration and administrative tasks,
- 4 mentioned needing other maintenance needs (two examples being, funding for grab bars and funding for supportive services),
- 3 mentioned a need for education,
- 2 mentioned a need for longer shelter stays or a greater access to shelters,
- 3 mentioned a need for funding related to elderly programming,

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

Homelessness is a complex societal problem with multiple roots. A lack of affordable housing, substance abuse, mental illness, and a lack of financial resources are some of the many contributing factors to homelessness. Demand for shelter and services had been in decline since 2013, when previously reported in the State’s Consolidated Plan. The number of clients receiving services and shelter from Homeless Management Information System (HMIS) participating agencies in Wisconsin had decreased almost 9% from 2013 to 2021, from 27,556 to 25,212.

However, the annual point-in-time (PIT) count in January 2024 recorded 5,037 people in emergency shelters, transitional housing, Safe Havens, or unsheltered – the highest number recorded since 2017. Of those people counted, 779 were experiencing chronic homelessness or homelessness for longer than one year the highest number since 2010. In Wisconsin, homelessness is most visible in metropolitan areas, but also exists in most rural counties in the state. Persons experiencing homelessness have a variety of backgrounds, demographic characteristics, and needs. Ending homelessness will require alternatives designed to meet the diverse needs of those experiencing homelessness.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	4,539	510	0	0	0	0
Persons in Households with Only Children	1,185	37	0	0	0	0
Persons in Households with Only Adults	2,762	473	0	0	0	0
Chronically Homeless Individuals	779	179	0	0	0	0
Chronically Homeless Families	176	3	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Veterans	351	23	0	0	0	0
Unaccompanied Youth	157	12	0	0	0	0
Persons with HIV		0	0	0	0	0

Table 25 - Homeless Needs Assessment

Data Source Comments:
January 2024 Point-in-Time Report

Table description

The above table includes information gathered in the January 2024 Point-in-Time Count. A total of 5,037 persons were counted on this single point in time, a rate of homelessness of 10 people per 10,000 people. This rate is less than the national average of 23 people per 10,000 people.

Table 2 Description

Data in the following sections comes from the Institute for Community Alliances “The State of Homelessness in Wisconsin 2019” report. The following table shows the number of people accessing an emergency shelter in calendar year 2019 by Continuum of Care and by Local Homeless Coalitions in the Balance of State regions. Though almost 43% of clients experienced homelessness in Dane and Milwaukee Counties, the data also shows that homelessness occurs at high rates in less populated areas of Wisconsin. Additionally, chronic homelessness, which is often presumed to be exclusively associated with the downtown core of urban areas, occurs across Wisconsin.

CoC*	Homeless Clients	Homeless Clients per 10,000 Residents	Children	Adult Men	Adult Women	Veterans	Chronically Homeless

BOS - Brown CoC	2,228	81	254	1,184	790	93	215
BOS - Central CoC	388	14	35	212	141	12	18
BOS - Coulee CoC	898	59	82	490	326	65	162
BOS - Dairyland CoC	770	47	58	427	285	35	147
BOS - East Central CoC	434	25	51	230	153	14	16
BOS - Fox Cities CoC	942	44	70	523	349	52	106
BOS - Jefferson CoC	83	16	7	46	30	0	5
BOS - Kenosha CoC	748	43	69	407	272	15	52
BOS - Lakeshore CoC	480	19	55	255	170	16	21
BOS - North Central CoC	571	27	38	320	213	22	83
BOS - Northeast CoC	312	26	17	177	118	5	15
BOS - Northwest CoC	528	53	26	301	201	28	20
BOS - N*Wish CoC	135	17	17	71	47	7	11
BOS - Ozaukee	54	6	7	28	19	2	0
BOS - Rock Walworth CoC	926	39	81	507	338	10	47

BOS-Rural North	154	12	21	80	53	4	11
BOS - Southwest CoC	98	5	6	55	37	1	1
BOS - Washington CoC	113	10	6	64	43	1	6
BOS - Waukesha CoC	968	25	83	531	354	34	145
BOS - West Central CoC	950	29	89	517	344	36	65
BOS - WinnebagoLand CoC	588	20	46	325	217	36	46
Racine CoC	1,004	54	72	559	373	34	43
Milwaukee CoC	6,031	63	495	3,322	2,214	149	319
Dane CoC	3,252	67	303	1,769	1,180	144	484
Balance of State	12,368	31	1,118	6,750	4,500	488	1,192
State of WI	21,632	39	1,988	11,786	7,858	815	2,038

Table 26 - Data Table: Homelessness by Continuum of Care and BOS Local Continuum of Care (CONTINUED)

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

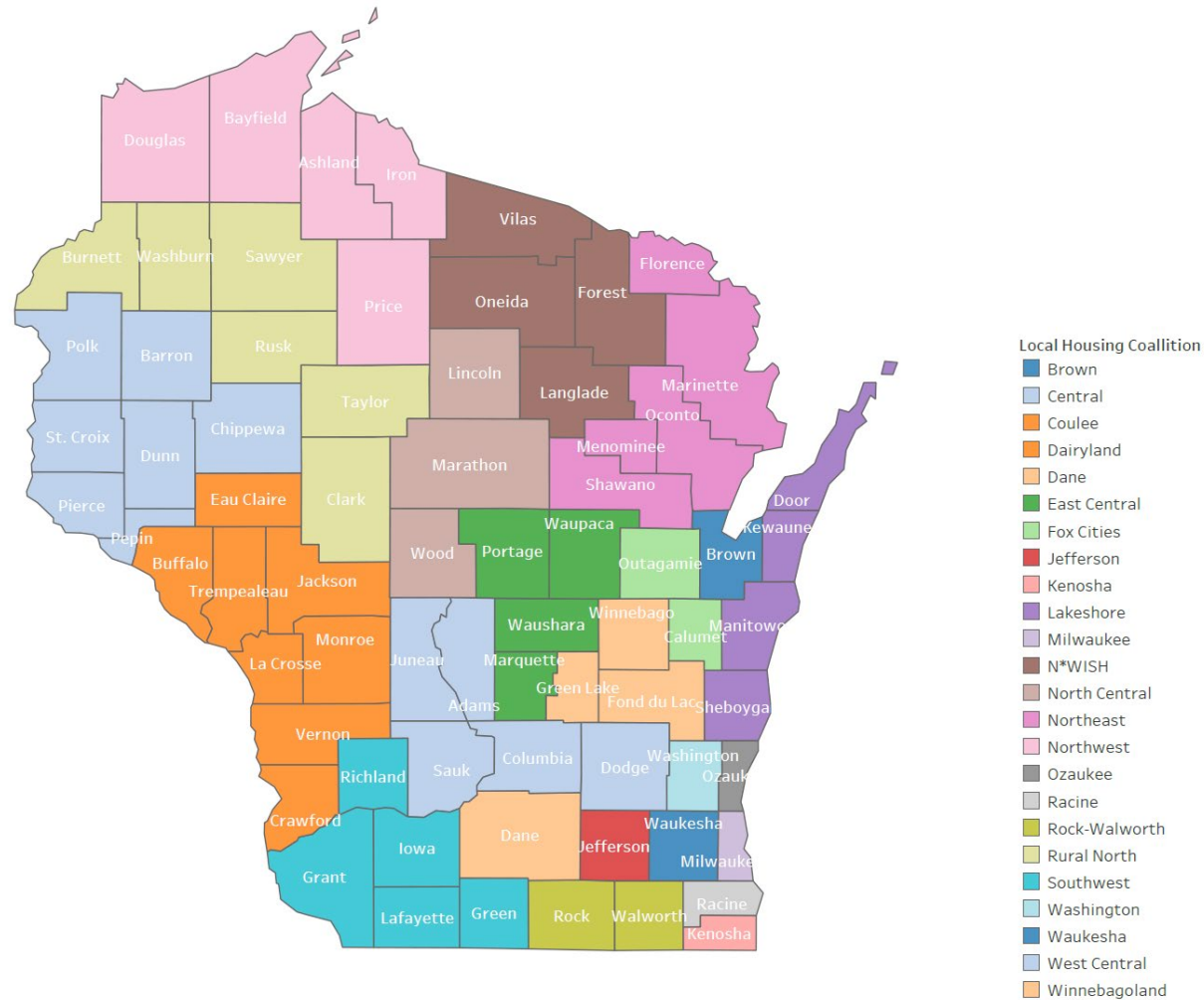
Table 27 - Homeless Needs Assessment

Data Source Comments:

HUD Continuum of Care and BOS Local Continuum of Care Regions

Because Wisconsin covers a large geographic area, it is divided for analysis purposes. Data is presented describing the four HUD Continua of Care: Dane County Continuum of Care, Milwaukee County Continuum of Care, Racine County Continuum of Care, and Balance of State Continuum of Care. The Balance of State Continuum of Care, which represents 69 of the 72 Wisconsin counties, is divided into “Local Homeless Coalition” regions, which are used by the Balance of State for governing purposes. The map below shows these regions.

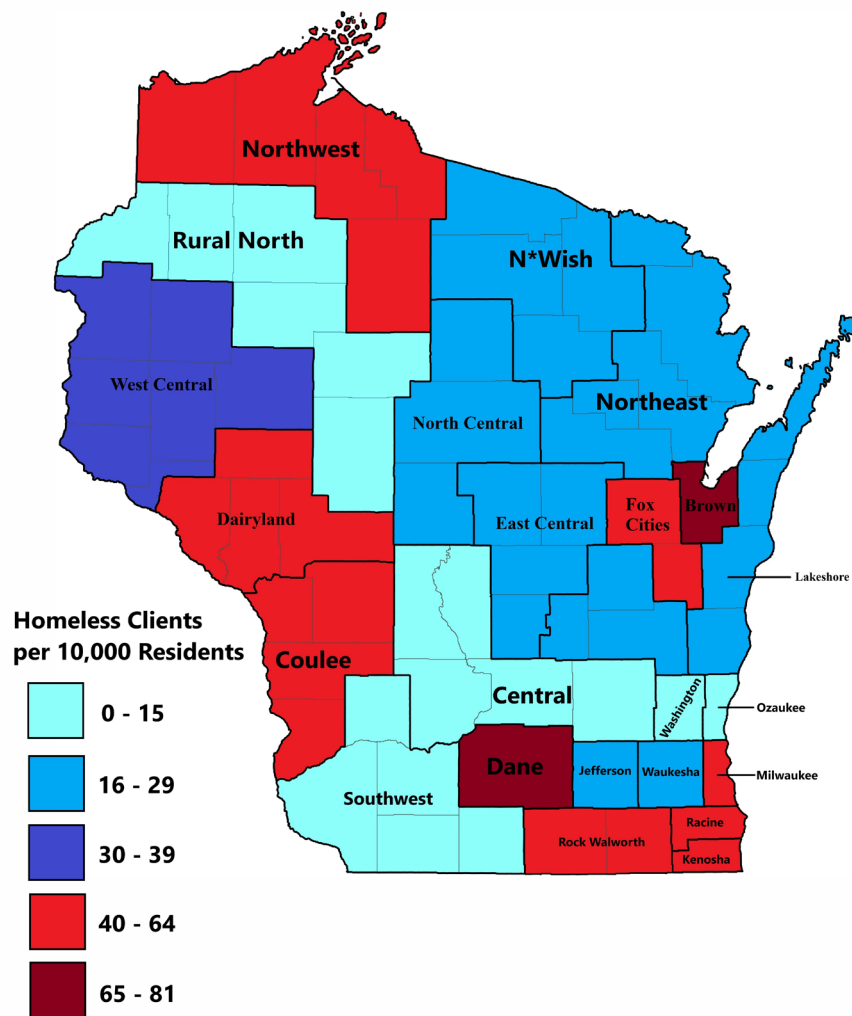
HUD Continuum of Care and Balance of State Local Homeless Coalition Regions



HUD Continuum of Care and BOS Local Homeless Coalition Regions

Number of Homeless Clients per 10,000 Residents

The following map visually depicts the number of homeless clients per 10,000 residents (column three in the preceding table) in each Continuum of Care and Local Homeless Coalition.



Number of Homeless Clients per 10,000 Residents

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

As the data displayed in the table and map above shows, homelessness is most prevalent in urban areas but is also experienced in rural areas. In fact, the rate of homelessness in some of the non-urban local Homeless Coalitions approaches the rate seen in urban areas. Individuals and families who experience homelessness in rural Wisconsin face unique barriers to regaining housing stability. Many of the existing homeless service providers are located in cities surrounded by a large rural area. Some counties and rural areas do not have a shelter facility, and the closest shelters could take hours to access by car. This geographic dispersion of providers combined with the transportation barriers often faced by homeless individuals and families can make it difficult to provide services to the rural homeless population. If the area shelters are full, or individuals cannot get to a shelter, they may live in their car or double up with friends, family, or others. This may create unsafe living situations and lead to an undercounting of those who are doubled up but who may have otherwise stayed in an emergency shelter.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

According to 24 CFR 91.5, A “chronically homeless” individual is defined to mean a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. Chronically homeless families are families with adult heads of household who meet the definition of a chronically homeless individual. If there is no adult in the family, the family

would still be considered chronically homeless if a minor head of household meets all the criteria of a chronically homeless individual. A chronically homeless family includes those whose composition has fluctuated while the head of household has been homeless.

This population is vulnerable, necessitating significant case management services to address concurrent issues. Persons experiencing chronic homelessness represent approximately 8.3% of the homeless population in Wisconsin, which is less than the U.S rate of chronic homelessness. Persons experiencing chronic homelessness tend to have higher rates of emergency room usage, hospitalization, and incarceration; they use a disproportionate share of resources compared to the rest of the homeless population.

Homeless Veterans represented approximately 4.1% of the homeless population served in 2019, which is down significantly from 2013 (8% of the population served). A national effort to end veteran homelessness has led to increased funding for HUD-Veterans Affairs Supportive Housing vouchers and the Supportive Services for Veteran Families program. According to the United States Interagency Council on Homelessness, through a concerted effort at the federal, state, and local level to increase opportunities for Veterans to access permanent housing, the number of Veterans experiencing homelessness in America in 2023 was reduced by an estimated 9% since 2020. Since 2010, the number of Veterans experiencing unsheltered homelessness was reduced by an estimated 50%. National decreases in veterans' homelessness have lagged behind the progress made in Wisconsin (9% of homeless nationally vs 4.1% in WI¹). Mayors in Madison and Milwaukee have signed onto the "Mayors Challenge" to end veteran's homelessness. In addition, there has been increased education of homeless service providers by veterans' program staff, spurring efforts to refer homeless veterans to the HUD-Veterans Affairs Supportive Housing and Supportive Services for Veteran Families programs.

A response regarding unaccompanied youth is included in the discussion section at the very end due to text limit constraints for this question.

¹ United States Interagency Council on Homelessness, "2023 Performance and Accountability Report"

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	8,476	0
Black or African American	7,111	0
Asian	185	0
American Indian or Alaska Native	683	0
Native Hawaiian or Pacific Islander	69	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	352	0
Not Hispanic	19,523	0

Source: 2023 Data provided by the Homeless Management Information System, Institute for Community Alliances.

Table description

The above table includes information on the race and ethnicity of those accessing Wisconsin homeless services in 2023. This data was obtained from the Institute for Community Alliances. In 2023, 19,875 persons accessed homeless services, according to the above racial breakdown.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

37% of persons experiencing homelessness in Wisconsin who sought services did so as members of a family or household as measured by the Institute for Community Alliances, the State of Homelessness in Wisconsin, 2019. Of the 22,087 total clients served during 2018, 8,004 were persons in families with adults and children.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

All of Wisconsin's racial and ethnic groups are represented in the statistics of those who accessed homeless services in 2023. The largest single ethnicity of these clients are white (42.64%), a significant underrepresentation compared to the Wisconsin population as a whole. African Americans represent approximately 7% of the Wisconsin population (according to American Community Survey data) but 35.77% of the population accessing homeless services. This is a substantial overrepresentation, and one that has shown up in analysis of HMIS data in years past.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In the January 2024 Point-in-Time Count, 510 persons were unsheltered, and 4,539 persons were sheltered. In Wisconsin, unsheltered homelessness occurs at significantly lower rates than in other parts of the country due to the cold winter climate. Cold weather may lead to doubling up or couch surfing by individuals who may otherwise be counted as homeless, especially in rural areas which lack homeless services. Unsheltered homeless rates are higher during the warmer months, according to data collected during the July Point-in-Time Count.

Discussion:

Unaccompanied youth are homeless youth that are not accompanied by a parent or guardian. Family conflict is often the cause of youth homelessness. The subpopulation of unaccompanied youth is difficult to track, and often double up, couch surf, or live on the streets. In 2019, 398 unaccompanied children received homeless services from HMIS participating providers, representing about 2% of the homeless population. This is a decrease from the 591 unaccompanied children that received services in 2013. The Department of Public Instruction (DPI) also measures youth homelessness using a more expansive definition of homelessness, which also includes youth that are doubled up or couch surfing. The DPI 2017-2018 End-of-Year Report indicates that there were 2,405 unaccompanied youth reported or identified during the school year. The Wisconsin Association of Homeless and Runaway Youth Services served 2,163 homeless and runaway unaccompanied youth in 2018. Though DEHCR funds runaway and homeless youth shelters, the Department of Children and Families (DCF) is responsible for many programs which provide services to unaccompanied homeless youth. DCF funds 22 programs that provide services to youth in crisis, such as street outreach, emergency shelter, and crisis intervention counseling. DCF also responds to youth homelessness among those in, aged out, or at-risk of entering foster care. Research has shown that youth who have aged out of or have had contact with the foster care system have a greater risk of homelessness than the overall population of youth.

An estimated 0.6% of the total US adult population is transgender, and 1.2% of youth experiencing homelessness in Wisconsin identify as transgender. According to the Williams Institute, as many as 40% of youth experiencing homelessness identify as LGBT+. As most homeless service providers in Wisconsin do not collect information on sexual orientation, this data is not available at the local level. LGBT+ individuals may face discrimination and rejection from family members, which can play a role in becoming homeless and struggling to regain housing. Many shelters in Wisconsin and throughout the United States are sex segregated, and LGBT+ individuals often have difficulty finding shelters that are safe and welcoming. Wisconsin level data about LGBT+ status has not been collected at this time, however, a Milwaukee survey conducted by the Cream City Foundation found that 23% of homeless youth surveyed identified as LGBT. The same survey found that LGBT+ homeless youth tended to be homeless for longer periods of time, report higher incidences of mental illness and substance abuse, and experience higher rates of sexual violence and victimization than their heterosexual peers. More study

of this issue is needed in order to fully understand the issues LGBT+ youth face and effectively target this population.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

This section describes the housing needs of persons who are not homeless but require supportive housing. These persons include:

- elders (defined as 62 and older),
- frail elders (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework),
- persons with mental, physical and/or developmental disabilities,
- persons with substance use disorders,
- persons with HIV/AIDS and their families,
- Victims of domestic violence, dating violence, sexual assault, and stalking.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	6,190
Area incidence of AIDS	85
Rate per population	1.5
Number of new cases prior year (3 years of data)	190
Rate per population (3 years of data)	1.5
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	6.216
Area Prevalence (PLWH per population)	127.3
Number of new HIV cases reported last year	210

Table 28 – HOPWA Data

Data CDC HIV Surveillance
Source:

Table description

This table details current Housing Opportunities for Persons with AIDS (HOPWA) formula use as well as the number of persons living with HIV in the State of Wisconsin. The HOPWA Program is the only Federal program dedicated to the housing needs of people living with HIV/AIDS. Under the HOPWA Program, HUD makes grants to local communities, states, and nonprofit organizations for projects that benefit low and moderate-income persons living with HIV/AIDS and their families. HOPWA provides funding through a formula program as well as a competitive program. The annual appropriation is divided between the two programs – 90% for formula program grants and 10% for competitive program

grants. The tables below discuss only formula program grants. The data in these tables was collected by Centers for Disease Control and Prevention HIV (CDC HIV) Surveillance.

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	14*
Facility Based Housing (Permanent, short-term or transitional)	0

Table 29 – HIV Housing Need

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Source:

* Likely that additional Short-term Rent, Mortgage, and Utility is needed to maintain current housing arrangements.

Describe the characteristics of special needs populations in your community:

Elders, Frail Elders, and People with Disabilities:

When discussing special needs populations, it is important to recognize that, compared to the general population, people with disabilities have less access to resources as they are more likely to be un- or under-employed. People living in poverty tend to have a higher incidence of disability, and elderly populations are more prone to disability as prevalence of disability increases with age. Elders, frail elders, and persons with disabilities are populations disproportionately susceptible to poverty and poor living conditions. Based on the *Olmstead vs. L.C.* decision, 1999, people with disabilities have the right to live in the community with community-based supports.

According to population projections from the American Community Survey, the Wisconsin population of persons aged 65 and older is expected to grow from 985,473 in 2018 to 1,054,247 in 2021 and is projected to grow to 1,380,293 by the end of 2023. This increases the proportion of those aged 65 and over from 17% of the total population to almost 24% of the total population. According to the American Community Survey, of the elderly population in Wisconsin, over 289,000 or 27.5% have a disability. Almost 9% of elders live below the poverty level and another 8.1% have income from 100 to 149% of poverty. Over 53% of all elderly renters are experiencing a cost burden (have rental costs greater than 30% of household income).

The American Community Survey reports that over 693,700 people in Wisconsin, or almost 12% of the population, have a hearing, vision, cognitive, ambulatory, self-care, or independent living disability. Of these, more than 409,800 are under 65 years of age. According to the Center for Budget and Policy Priorities, in 2018, of the 131,400 people in Wisconsin (78,000 households) who used federal rent

assistance to afford modest housing, 38,100 were people with disabilities. In addition, according to the Institute for Community Alliances, in 2019, the number of people with physical disabilities served by homeless shelters in Wisconsin was 7,917.

Persons with substance use disorders:

Dependence on drugs and/or alcohol is one of the most significant risks that alcohol or drug users face, as it can lead to health problems. Users who inject drugs risk contracting HIV, hepatitis C, and other infectious diseases. Alcohol-Related Disease Impact software from the Centers for Disease Control and Prevention identifies the proportion of deaths that are alcohol-related for a total of 54 chronic and acute conditions. Mortality from alcohol-related liver cirrhosis is a direct consequence of chronic alcohol consumption. Health problems resulting from substance abuse can cause a financial burden, lead to a physical or mental disability, and an inability to work. According to the Wisconsin Department of Health Services, 1,427 deaths were attributed to opioids in Wisconsin in 2021. Another 3,133 emergency room hospitalizations were reported by DHS in 2021 due to opioids.

In addition to health concerns and health care needs, addictive disorders disrupt relationships with family and friends and can cause people to lose their jobs. For those already struggling financially, a loss of income could also cause them to lose their housing. It is also important to note that substance use disorders can be a result of a loss of housing rather than a cause as substance use can be a coping mechanism for those in difficult situations.

Addiction has large societal costs and behavioral health disorders are an increasing public health concern. According to the 2016 Wisconsin Epidemiological Profile on Alcohol and Other Drug Use, since at least 2000, rates of alcohol dependence, alcohol abuse, adult binge-drinking and alcohol-related motor vehicle fatalities have been higher in Wisconsin than in the United States as a whole. Because of this, Wisconsin's experiences with the consequences associated with alcohol use (mortality, morbidity, and dangerous criminal behavior) have also tended to be higher than the national average.

The prevalence of use of illicit drugs (marijuana, cocaine, heroin, inhalants, methamphetamines, and non-medical use of prescription drugs) for ages 12 and older of are detailed in the Wisconsin Department of Health Services' 2021 Annual Report to the Governor on Activities Relating to Substance Abuse Prevention and Treatment states that "Deaths in Wisconsin relating to drugs have been increasing over the last decade. The age-adjusted rate for mortality related to drugs increased from 10.9 deaths in 2010 to 29.4 deaths per 100,000 population in 2021 (Data Direct, Opioid Summary Module, DHS 2022)." Further, "In 2019, the most recent data available at the time this report was compiled, approximately 7.66 percent of people in Wisconsin had a substance use disorder, which is higher than the national average of 7.32 percent (SAMHSA, 2021)." Lastly, "The impacts of drug use, specifically opioids, are demonstrated in hospital data, as well as death records. The age-adjusted rate of emergency room hospitalizations for opioid overdoses has more than tripled from 17.1 per 100,000 population in 2010 to 53.7 per 100,000 population in 2021 (Data Direct, Opioid Hospitalization Module, DHS 2022)."

Wisconsin consistently reports higher percentages of both alcohol use and binge drinking. Furthermore, 38.5 percent of people age 12 and older in Wisconsin report a lower perception of great risk from having five or more drinks of an alcoholic beverage once or twice a week compared to 44.8 percent of people in the United States (SAMHSA, 2020). More specifically, youth ages 12-17 report a much lower perception of risk (36.2 percent) from five or more alcoholic drinks than what national youth report (43.4 percent) (SAMHSA, 2020).

Victims of domestic violence, dating violence, sexual assault, and stalking:

Victims of domestic violence face a variety of economic barriers to self-sufficiency. These persons may lack access to financial resources due to the actions of their abuser. Residents of public or subsidized housing may face an added challenge as the abuser may be the one on the lease. Affordable and safe housing was identified as the top need by both domestic violence victims and service providers as reported to DEHCR by the Wisconsin Department of Children and Families. A lack of affordable housing causes longer stays in shelters. This, in turn, causes shelters to be full which may lead to families being turned away.

The most common housing problems experienced by victims of domestic violence, dating violence, sexual assault, or stalking as identified by the Department of Children and Families are:

- The lack of affordable and safe housing in most communities. If affordable housing can be located, often the conditions are so poor as to be dangerous for survivors and their families.
- The recent deterioration of tenants' rights has increased barriers to housing access and safety.
- Long waiting lists for housing authorities and low-income housing facilities. Domestic abuse programs report waiting periods of six months to one year (or longer).
- Inability to access housing services due quickly and safely to the complexities of a housing system that is funded by many different sources, each with complex restrictions.
- Longer than necessary stays in shelter, and fewer available beds for others seeking safety, due to the long waits and complex processes for obtaining affordable housing.
- Even when survivors have managed to obtain housing assistance or vouchers, many face enormous challenges in securing housing due to barriers – often as a result of their abuse - such as poor credit, an eviction history, unstable employment, or limited income. Many landlords refuse to rent to persons with such barriers, or, in communities where renters may compete for limited affordable housing, landlords give preference to others without these the barriers (e.g., those with no evictions or those with good credit rating).
- Safety and confidentiality are key needs of domestic abuse victims and cornerstones of all service provision, not just shelter services. Strong collaborative partnerships, including cross-

referral and information-sharing protocols, must continue to afford victims basic privacy and confidentiality safeguards. Safety considerations should be embedded in all aspects of service provision, including housing location.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elders and Frail Elders:

The housing needs of the elderly are projected to grow as the baby boomer generation ages and advances in medical technology extend the average lifespan. According to the Wisconsin Poverty Report for 2020, poverty rates in Wisconsin rose for elders from 9.5% in 2017 to 9.7% in 2020. As a result, elders and frail elders may face housing cost burdens related to affordability or may need home modifications and supportive services that allow them to age in place. In addition, access to transportation, health care, and other public and private resources, facilities, and services are considered when weighing housing options. According to national research conducted by Fannie Mae, an increasing share of elders (aged 65-74) and older elders (75 and older) are choosing to live in housing units, rather than group quarters. This presents housing challenges particular to the older elders, who have higher rates of disability and more medical needs.

The 2020 Wisconsin Poverty Report also states that, due to increasing costs for out-of-pocket medical expenses, co-payments for medical services, prescription and other drug costs as well as uninsured medical expenses, elders and frail elders are increasingly housing cost burdened. The need for specialized or retrofitted housing and supportive services will continue to grow as elderly populations increase. Policies seeking to accommodate frail elders should incorporate affordability, accessible design in both residential and group homes, and increased supportive services to meet the needs of an aging population.

Persons with Disabilities:

Persons with disabilities face a range of housing related issues. The amount of benefit received as part of the Supplemental Security Income program places a person in the HUD “extremely low-income limit” group in Wisconsin. Many people with disabilities who rely on Supplemental Security Income (SSI) payments fall into this category. According to the Federal Social Security Administration, Office of Retirement and Disability Policy, in 2021, a person with a disability in Wisconsin received SSI benefits equal to \$865 per month. Statewide, this income was equal to 20.5% of the area median income resulting in having to pay 69% of that recipient’s monthly income to rent an efficiency unit or 81% of their monthly income for a one-bedroom unit.

Besides affordability, persons with disabilities also face issues related to accessibility in housing, aging caregivers, and housing discrimination. As with elders, access to transportation, health care, and other facilities and services are important factors when weighing various housing options. Financing for housing rehabilitation and modification to allow persons with disabilities to function independently or make homes accessible will continue to be a critical need. Overall, the most common housing problems for persons with disabilities is affordable, accessible, safe housing that is integrated into their chosen community.

The Wisconsin Council on Physical Disabilities also identifies “visitability” as a housing problem experienced by persons with physical disabilities. “Visitability” is achieved when persons with a physical disability – for example people who depend on wheelchairs, scooters, and other assistive mobility devices – are able to visit family or friends without facing barriers to access to their family or friends’ homes (that their family’s and friends’ homes are accessible). In addition to visitability, The Wisconsin Council on Physical Disabilities identifies “universal design” – designing products and spaces so that they can be used by the widest range of people possible – as a way to best meet the different needs of persons with disabilities. Universal design, although not always possible to construct due to demand and funding, makes housing safer, more accessible, and more convenient for everyone.

Persons with substance use disorders:

Dependence on drugs and/or alcohol is one of the most significant risks that alcohol or drug users face, as it can lead to health problems. Users who inject drugs risk contracting HIV, hepatitis C, and other infectious diseases. Alcohol-Related Disease Impact software from the Centers for Disease Control and Prevention identifies the proportion of deaths that are alcohol-related for a total of 54 chronic and acute conditions. Mortality from alcohol-related liver cirrhosis is a direct consequence of chronic alcohol consumption. Health problems resulting from substance abuse can cause a financial burden, lead to a physical or mental disability, and an inability to work. According to the Wisconsin Department of Health Services, 1,427 deaths were attributed to opioids in Wisconsin in 2021. Another 3,133 emergency room hospitalizations were reported by DHS in 2021 due to opioids.

In addition to health concerns and health care needs, addictive disorders disrupt relationships with family and friends and can cause people to lose their jobs. For those already struggling financially, a loss of income could also cause them to lose their housing. It is also important to note that substance use disorders can be a result of a loss of housing rather than a cause as substance use can be a coping mechanism for those in difficult situations.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Centers for Disease Control, more people than ever are living with HIV/AIDS in Wisconsin. HIV/AIDS continues to threaten Wisconsin’s population, including the next generation. Importantly, in 2020 and with care, 71% of people living with HIV in Wisconsin were virally suppressed,

according to the Wisconsin Department of Health Services. According to DHS, in 2020, 208 cases of HIV infection were diagnosed in Wisconsin. Between 2008 and 2020, both the number and rate of new diagnoses declined. The number of new diagnoses over the last decade ranged from a low of 208 in 2020 to a high of 282 in 2009, with an average of 242 diagnoses per year.

HIV infection disproportionately affects racial/ethnic minorities. During 2020, 61% of new diagnoses were among racial/ethnic minorities, despite minorities making up just 19% of Wisconsin's population. During 2013-2020, the HIV diagnosis rate for males was 13 times higher among Blacks, five times higher among Hispanics and almost two times higher among Asians and Native Americans as compared to Whites². In addition, for females, the HIV diagnosis rate was 21 times higher among Blacks and five times higher among Hispanics as compared to Whites.

In 2020, HIV cases were diagnosed in 33 of the 72 counties in Wisconsin, the distribution was uneven:

- Milwaukee County cases accounted for 0 of new diagnoses,
- Dane County for 9%,
- Brown County 6%,
- all other counties accounted for fewer than 5% of diagnoses.

Additionally, in 2020, 181 individuals previously diagnosed with HIV infection moved to Wisconsin from another state or country while 310 individuals previously diagnosed with HIV infection left Wisconsin. As of the end of 2020, 6,926 individuals reported with HIV or AIDS were presumed to be alive and living in Wisconsin. An estimated 1,109 are unaware of their HIV infection in Wisconsin (as CDC estimates 13.8% of people living with HIV are unaware of their HIV status). Services for people living with HIV need to address health conditions of aging in addition to HIV infection. As persons living with HIV/AIDS are disproportionately living in urban areas in Wisconsin, urban housing problems need to be addressed in addition to HIV/AIDS infection.

Discussion:

Comorbidity, or the simultaneous presence of two chronic diseases or conditions, is something to be considered when discussing special needs populations and housing needs. An individual or family may experience a multi-level need as they experience one or more special needs. Persons with concurrent disorders, or co-occurring addiction and mental health problems, are of particularly high need and are often disconnected from mainstream services.

² Wisconsin Department of Health Services, "Wisconsin HIV Surveillance Annual Review" 2020

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

The Division of Energy, Housing and Community Resources CDBG Public Facilities programs provide grants and loans to CDBG eligible local governments to help them serve low- and moderate-income persons. The programs are open to all local units of government that do not receive CDBG funds directly from HUD. The primary goals of DEHCR's Public Facilities CDBG programs include:

- Ensuring the affordability of basic services that enhance community vitality.
- Promoting improved housing and economic opportunities for low- and moderate-income households.
- Promoting development of public facilities.
- Supporting revitalization of established neighborhoods, downtown business districts and blighted sites.
- Assisting with capital improvements projects that support previous planning efforts and are part of broader community development strategies.
- Encouraging the use of energy efficient design, retrofitting, and equipment, as well as projects that benefit bicyclists and pedestrians.
- Improving accessibility to public facilities.
- Responding to natural and man-made disasters or catastrophic events.
- Assisting communities address the vulnerability of public facilities to natural hazard risks; and
- Increasing the availability of broadband internet access.

Below details Wisconsin's community development needs by categories designated by HUD: public facilities, public improvements, and public services.

The Division of Energy, Housing and Community Resources conducted an online public survey to solicit input regarding community development and public facilities needs, among other topics. Wisconsin's public facilities are old and in need of rehabilitation. Many responses indicated that their community had infrastructure that was outdated and in need of repair or replacement. Some respondents also mentioned that poorly maintained or blighted buildings need to be repaired, rehabilitated, or demolished – particularly buildings with lead-based paint hazards. Participants also felt that recreational facilities (for example parks), affordable daycare centers, community centers, senior centers, and fire stations need to be rehabilitated, or in some cases, constructed. Building accessible recreational facilities, specifically accessible bathrooms in public facilities, was also highlighted as a public facilities need.

DEHCR has also heard from communities that are concerned about the vulnerability of their housing to natural hazards. Communities are concerned that potential failures to their public facilities, due to natural hazards, could put housing at risk. Low and moderate-income households are especially vulnerable to natural hazards. Utilizing those public inputs, DEHCR has previously made natural hazard

mitigation an eligible use of CDBG-CLOSE funds. In addition to CDBG-CLOSE, DEHCR will extend the eligibility of CDBG funds to mitigating natural hazards to public facilities under the CDBG-Public Facilities program.

Participants were asked to rank six different public facilities priorities in order of importance based on the needs of their communities. The ranked priorities are below, ordered from the highest priority to the lowest priority.

1. Fund community development planning efforts that spur new investment
2. Address public infrastructure deficiencies such as storm sewers or streets
3. Assist in building or rehab of fire stations, libraries, or other public facilities
4. Support energy efficient design and retrofitting in public facilities
5. Fund accessibility modifications such as wheelchair ramps in public facilities
6. Support projects that respond to natural disasters or mitigate hazards

How were these needs determined?

Needs were determined via an assessment of past and present public facilities grants, an online public survey which solicited public input, DEHCR consultations with stakeholders, and through public hearings and public testimony received.

Describe the jurisdiction's need for Public Improvements:

Survey respondents noted that there is a need for repairs to streets, street lighting, sewers, water supply or water mains, and blighted buildings. Many of Wisconsin's cities and villages also need general reconstruction of their main street or downtown areas. Respondents also indicated that funds are needed, not only for reconstruction or rehabilitation, but also for project administration as some public projects have been poorly maintained. Property damage from flooding and other natural disasters or catastrophic events was also mentioned in the survey and the need to make those facilities resilient to future disaster events. In addition, community access to broadband internet is a priority for community members.

How were these needs determined?

Needs were determined via an assessment of past and present public facilities grants, an online public survey which solicited public input, DEHCR consultations with stakeholders, and through public hearings and public testimony received.

Describe the jurisdiction's need for Public Services:

HUD allows up to 15% of yearly CDBG allocation to be used on eligible public services activities. When asked, during public input sessions and surveys, about the need for increased funds for public services,

stakeholders and residents frequently agreed that there is a need for increased funding for public services. The needs were diverse but followed similar trends. In all areas of the state, respondents felt that there was an urgent need to provide supportive services, treatment, and/or aftercare services for special needs populations (see NA-35 regarding special needs populations) – persons who experience chronic homelessness, due to mental health issues or substance abuse, and victims of domestic violence were most frequently mentioned. Public Input session attendees also cited transportation issues as exacerbating employment and housing issues, especially in areas in which a car is needed to access employment and services. Utilizing public input, DEHCR has made Public Services an eligible use of CDBG-CLOSE funds.

How were these needs determined?

Needs were determined via an assessment of past and present public facilities grants, an online public survey which solicited public input, DEHCR consultations with stakeholders, and through public hearings and public testimony received.

Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in Wisconsin to meet housing, business, and infrastructure needs caused by the disasters.

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

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Market Analysis provides an overview of the environment in which DEHCR will administer its programs over the course of the 2025-2029 Consolidated Plan.

MA-10 – 20: General Characteristics of the Housing Market

- Wisconsin's housing market varies by region. The most common themes are an aging housing stock and the prevalence of 1-unit detached structures (or single-family housing). There is a shortage of affordable housing among all housing types. Much of the existing affordable housing stock is in poor condition and in need of rehabilitation.
- Lead-Based Paint Hazards: 62% of Wisconsin's owner-occupied housing stock and 61% of Wisconsin's renter-occupied housing stock were built before 1980. HUD estimates three quarters of housing units built before 1980 contain some lead-based paint. Due to this, lead-based paint hazards continue to be a concern in Wisconsin, particularly among housing units built before 1980 with children present.

MA-25: Public and Assisted Housing

- There are 123 Public Housing Authorities, 58 provide low rent units, 27 administer Housing Choice Vouchers (HCV), and 38 are combined low rent units and HCV's. There are a total of 29,393 Public Housing units in Wisconsin at 140 different Public Housing properties across the state, 2,295 units are specifically designated as accessible units for the elderly and/or persons with disabilities.

MA-25: Homeless Facilities

- Wisconsin's emergency shelter and homeless programs vary from community to community, reflecting individual local needs and resources. They are funded through a combination of local, state, and federal funds, and significant local private cash and volunteer contributions. There is a need for funding of programs and interventions which efficiently use public dollars and whose effectiveness is backed up by evidence.

MA-35: Special Need Facilities and Services

- The Division of Energy, Housing and Community Resources, Department of Health Services, Department of Children and Families, and Department of Corrections all provide services,

resources, and funds to support persons with special needs. Special needs populations addressed in this section include: the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addictions, persons living with HIV/AIDS and their families, victims of domestic violence, dating violence, sexual assault, and stalking, and persons with mental illness.

MA-40: Barriers to Affordable Housing

- Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing varies widely throughout the state and is typically affected by local policies over which the state has little control.
- Additional funding is needed to convert vacant or abandoned commercial structures to affordable housing.

MA-45: Non-Housing Community Development Assets

- There is a significant need for programs targeted towards spurring job creation, programs which train workers with the skills currently demanded by employers, general economic development programs, and community development and planning efforts targeted to ensuring a strong local economy.

MA-10 Number of Housing Units – 91.310(a)

Introduction

Wisconsin's housing market varies by region. Three common themes are an aging housing stock, the prevalence of single-family detached housing and a lack of available, affordable safe and sanitary housing especially for extremely low-income households. The Division of Energy, Housing and Community Resources funds several programs that aim to increase the availability of safe, accessible, and affordable housing for low and moderate-income Wisconsin households.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,636,891	67%
1-unit, attached structure	113,055	5%
2-4 units	231,579	9%
5-9 units	122,546	5%
10 or more units	284,228	12%
Mobile Home, boat, RV, van, etc	61,671	3%
Total	2,641,627	100%

Table 30 – Residential Properties by Unit Number

Data Source: 2021 ACS

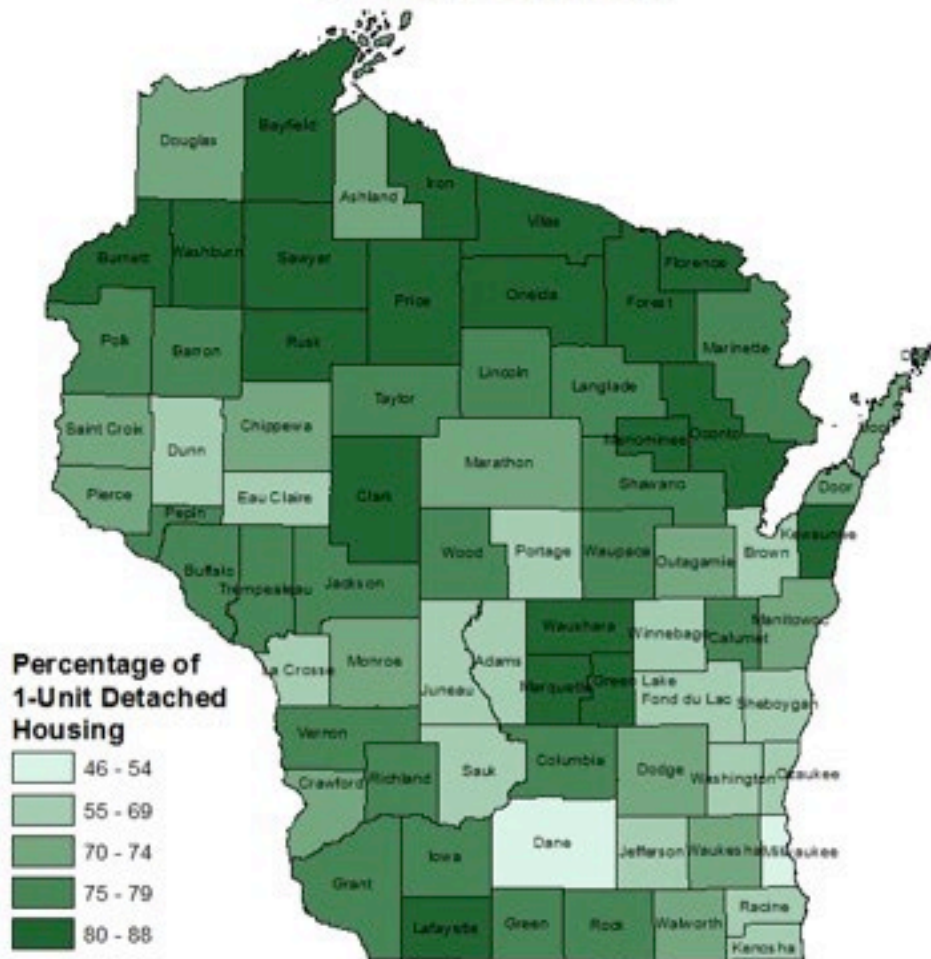
Table description

The above table shows the number and type of residential properties in Wisconsin. The dominant housing type in Wisconsin is 1-unit detached structures (single family homes), but there is also a large portion of multi-unit structures located in urban areas.

Single Family Housing in Wisconsin

The following map shows the percentage of 1-unit detached structures (single family housing) by county in Wisconsin. Northern and rural housing stock tends to be dominated by single family structures, while counties in the southern and urban areas have larger populations, but proportionally less single-family housing stock.

Single Family Housing in Wisconsin



Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	2,863	0%	35,971	5%
1 bedroom	32,375	2%	198,185	25%
2 bedrooms	1,168,998	70%	498,888	64%
3 or more bedrooms	464,339	28%	48,351	6%
Total	1,547,197	100%	751,910	100%

Table 31 – Unit Size by Tenure

Data Source: 2021 ACS

Table description

The above chart shows the number and percentage of owner-occupied and rental housing stock by size. Owner occupied homes tend to be larger, with 79% of owner-occupied structures containing 2 or 3 bedrooms. Rental units tend to be smaller with 25% of units containing one bedroom.

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Division of Energy, Housing and Community Resources funds several programs that further the goal of building affordable housing for low and moderate-income Wisconsinites. The CDBG Housing program distributes funding to seven regions in Wisconsin. In addition, general purpose units of local government are eligible to apply for funding. This funding is used for acquisition, rehabilitation, and homebuyer assistance. The HOME Rental Housing Development and the Housing Trust Fund programs funded 144 new rental housing units targeted to households with incomes below 60% CMI and below 30% CMI during the 2021 program year. Through the HOME TBRA program, the Division of Energy, Housing and Community Resources funded rental assistance to 2,487 households with incomes below 60% CMI. The HOME Homebuyer/Rehab program funded 55 housing down payments to households with incomes below 80% CMI and rehabilitated 38 owner-occupied properties for households with incomes below 60% CMI. Other Division of Energy, Housing and Community Resources programs provided rental assistance to individuals and households experiencing homelessness, at risk of homelessness, or fleeing domestic violence.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There is no comprehensive estimate of units expected to be lost from the affordable housing inventory in Wisconsin.

Does the availability of housing units meet the needs of the population?

There is a significant shortage of affordable housing for low and moderate-income households. According to the National Low-income Housing Coalition, across Wisconsin, there is a shortage of rental homes affordable and available to extremely low-income households (ELI), whose incomes are at or below the poverty guideline or 30% of their area median income (AMI). Many of these households are severely cost burdened, spending more than half of their income on housing. Severely cost burdened poor households are more likely than other renters to sacrifice other necessities like healthy food and healthcare to pay the rent, and to experience unstable housing situations like evictions.

There is also a shortage of 3 or more-bedroom rental units for families. Large, low-income families often have a difficult time qualifying for mortgages, an issue that has worsened due to a lack of available housing, especially in rural areas of the state. Families must find housing in the rental market, which

does not contain an adequate number of 3 or more-bedroom units. This can lead to overcrowding (which is further discussed in the housing needs assessment) and/or an inability to find housing.

The dominance of single-family housing in northern and rural Wisconsin can also make it difficult for low and moderate-income renter families to find housing near employment. Northern and rural counties have very little rental stock, making it difficult for low-income families to find housing.

Wisconsin's aging senior population has changed the demand for housing. There is an increased need for accessible homes that allow seniors to age in place as well as senior oriented housing communities that incorporate services. Housing of this type must also take into consideration the fact that many seniors have fixed incomes and cannot afford costly home renovations and senior housing communities.

Describe the need for specific types of housing:

Respondents to the Division of Energy, Housing and Community Resources' online public survey were asked to rank affordable housing construction and rehabilitation priorities. The rankings are listed below, from highest priority to lowest priority.

1. Build affordable rental housing.
2. Rehabilitate affordable rental housing.
3. Rehabilitate affordable owner-occupied housing.
4. Build affordable owner-occupied housing.
5. Convert market rate housing into affordable housing.
6. Convert vacant or abandoned commercial structures to affordable housing.

Similar feedback was received in public input sessions, with attendees mentioning a lack of rental housing in rural areas and a lack of rental housing affordable to low-income households in urban areas.

Discussion

MA-15 Cost of Housing – 91.310(a)

Introduction

The cost of housing has increased in Wisconsin over the last 15 years. Wages have not kept pace, leading to an affordability crisis for many low and moderate-income Wisconsin households. The following table shows the median home value and contract rent in Wisconsin.

Cost of Housing

	Base Year: 2015	Most Recent Year: 2021	% Change
Median Home Value	165,800	239,500	44.5%
Median Contract Rent	651	792	22%

Table 32 – Cost of Housing

Data Source: 2011-2015 ACS (Base Year), 2021 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	102,816	13.8%
\$500-999	442,570	59.1%
\$1,000-1,499	146,314	19.6%
\$1,500-1,999	40,844	5.5%
\$2,000 or more	14,882	2.0%
Total	747,426	100.0%

Table 33 - Rent Paid

Data Source: 2021 ACS

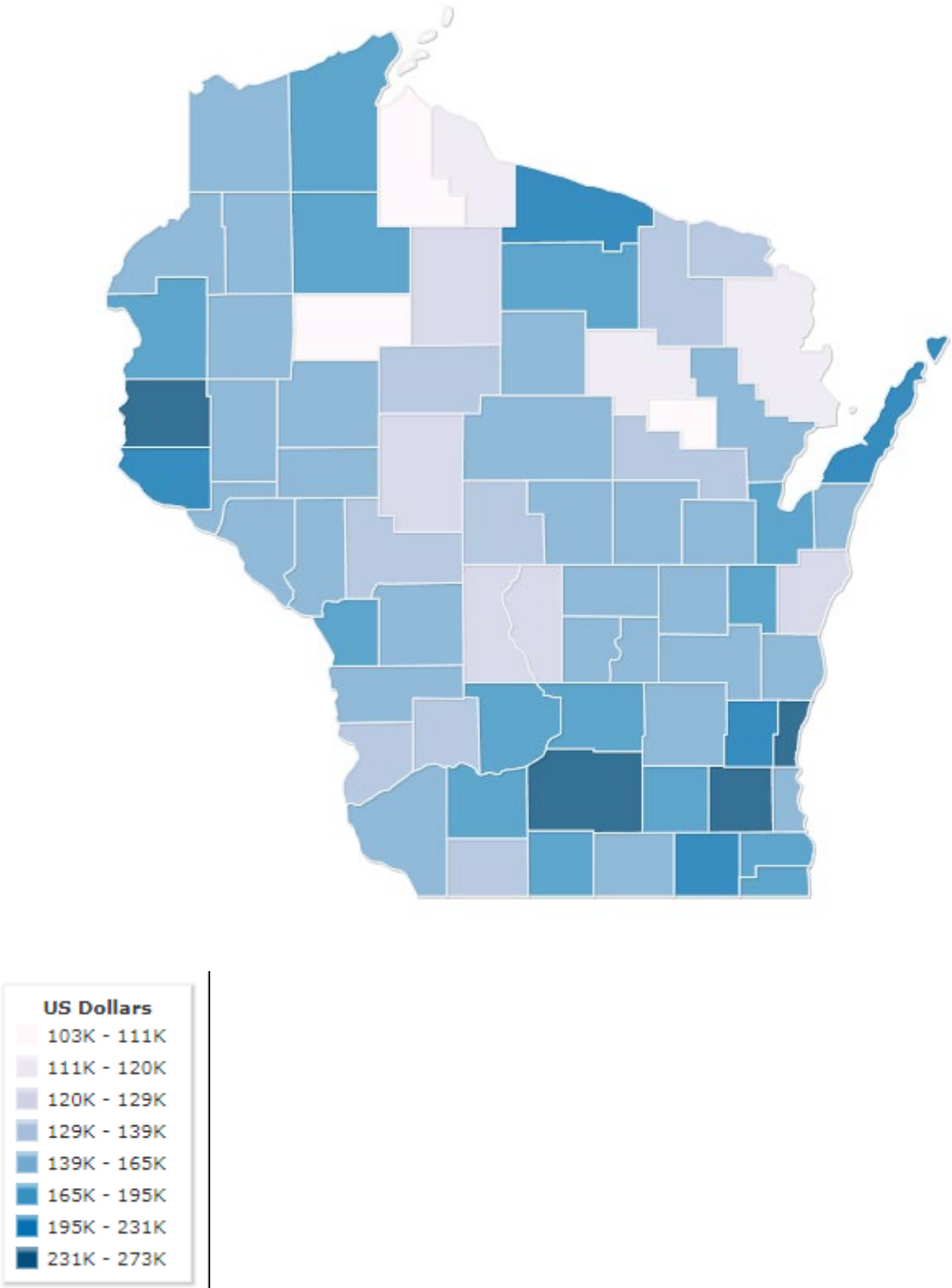
Table description

The above table breaks up the number and percent of renter households by cost category.

Median Value of Owner-Occupied Units

The following figure shows the median value of owner-occupied units by county in Wisconsin. Housing values are the highest in growing metropolitan areas, such as the counties surrounding Milwaukee, Dane County, and the Counties across the border from the Minneapolis/St Paul, Minnesota area. Housing values are the lowest in the most rural counties of Wisconsin.

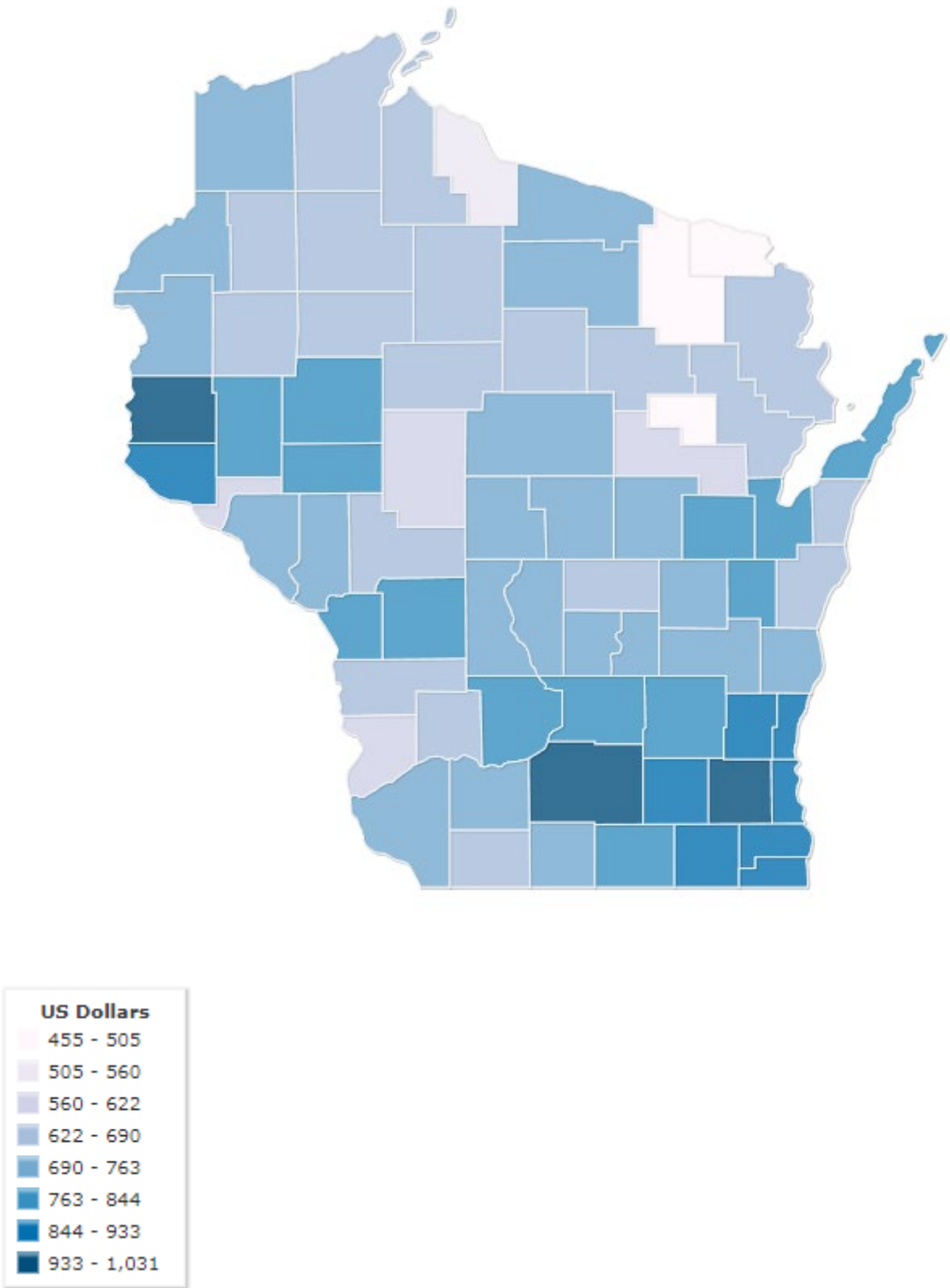
Median Value of Owner-Occupied Units by County



**Median Value of Owner-Occupied Units
Median Gross Rent**

The following figure shows the median gross rent by county in Wisconsin. Trends in gross rent are similar to those seen in the owner-occupied market, with high gross rents in growing metropolitan areas and lower gross rents in rural areas.

Median Gross Rents by County



Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	8,390	9,800

% Units affordable to Households earning	Renter	Owner
50% HAMFI	22,065	4,370
80% HAMFI	6,175	1,525
Greater than 80% HAMFI	3,775	3,775
Total	40,405	19,470

Table 34 – Housing Affordability

Data Source: 2017-2021 CHAS

Table description

The above table shows the number of rental and owner-occupied units available to households at various income levels. Reviews of the data presented in the housing needs assessment which describe the number of households at each income level, there is a clear shortage of units available to low and moderate-income households. Another contributing factor to the shortage of affordable units is the fact that in many cases, affordable units are unsubsidized and do not have income restrictions. In this case, households who are making higher incomes may reside in these units in order to reduce their housing costs.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent					
High HOME Rent					
Low HOME Rent					

Table 35 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Table description

Data to populate the above table is not available at the state level. Therefore, this table will be left blank.

Is there sufficient housing for households at all income levels?

Wisconsin is experiencing a shortage of affordable rental and owner-occupied units for extremely-low, low and moderate-income households. This shortage is most severe among extremely low-income renters. Respondents to the online public survey consistently ranked more affordable housing as a high

priority. This need is backed up by data included in the housing needs assessment, which shows high percentages of low and moderate-income Wisconsinites with a housing cost burden and severe housing cost burden. Despite the need and demand for additional housing units, the U.S. Census reports that housing permits issued in Wisconsin remained nearly flat from 2016 to 2021. This reflects a national trend, according to the U.S. Commerce Department, which shows that despite demand for new housing, shortages of skilled labor, available lots and building materials are restricting the supply of new housing units. In addition, recent increases to the fixed interest mortgage market have impacted housing prices. In reaction to rising interest rates, housing starts are down slightly in 2021 as opposed to 2020.

How is affordability of housing likely to change considering changes to home values and/or rents?

Rental Market:

Median contract rents have increased 22% between 2015 and 2021, from \$651 to \$792. During this time period, median household income has only risen 18% from \$56,759 to \$67,125. As household income has not risen at the same rate as housing costs, households are increasingly spending a greater percentage of their income on housing. In addition, the lack of available single-family homes has driven many households that would otherwise be homeowners into the rental market. This has increased competition for rental units and may have the effect of increasing rents charged by landlords. In some regions, especially those near growing metropolitan areas (Dane County, Milwaukee and its surrounding counties, and St. Croix County), rents can be significantly higher than the state median rent.

Owner-Occupied Market:

Despite the need and demand for additional housing units, the U.S. Census reports that housing permits issued in Wisconsin remained nearly flat from 2018 to 2021. This reflects a national trend, according to the U.S. Commerce Department, which shows that despite demand for new housing, shortages of skilled labor, available lots and building materials are restricting the supply of new housing units. Recent increases to the fixed-rate mortgage market have further restricted access to housing and housing starts are down slightly in 2022 as compared to 2021. Many economists predict that interest rates will continue to be higher in the short term due to likely actions of the Federal Reserve. This should continue to negatively impact housing access as well as supply as borrowing costs remain elevated as compared to recent rates.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

This data is not available at a state level.

Discussion

MA-20 Condition of Housing – 91.310(a)

Introduction:

The age of Wisconsin's housing stock poses significant challenges. 57% of existing housing units were built before 1979. Structures of this age often have issues, including lead paint, and are in need of rehabilitation. As in the rest of the United States, renter-occupied units are more likely to be in need of rehabilitation than owner-occupied units.

Definitions

The Division of Energy, Housing and Community Resources programs defines a housing unit/development is of standard condition if it meets HUD Housing Quality Standards or meets all state and local codes. DEHCR defines substandard condition but suitable for rehabilitation as a unit is in poor condition but is both structurally and financially feasible to rehabilitate.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected condition	324,209	21%	314,351	41%
With two selected conditions	6,657	0%	19,310	3%
With three selected conditions	1,115	0%	2,035	0%
With four selected conditions	231	0%	27	0%
No selected conditions	1,227,096	79%	433,723	56%
Total	1,559,365	100%	769,446	100%

Table 36 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	340,078	20%	162,084	21%
1980-1999	371,862	22%	170,278	22%
1950-1979	656,330	39%	305,793	39%
Before 1950	300,305	18%	143,240	18%
Total	1,668,575	100%	781,395	100%

Table 37 – Year Unit Built

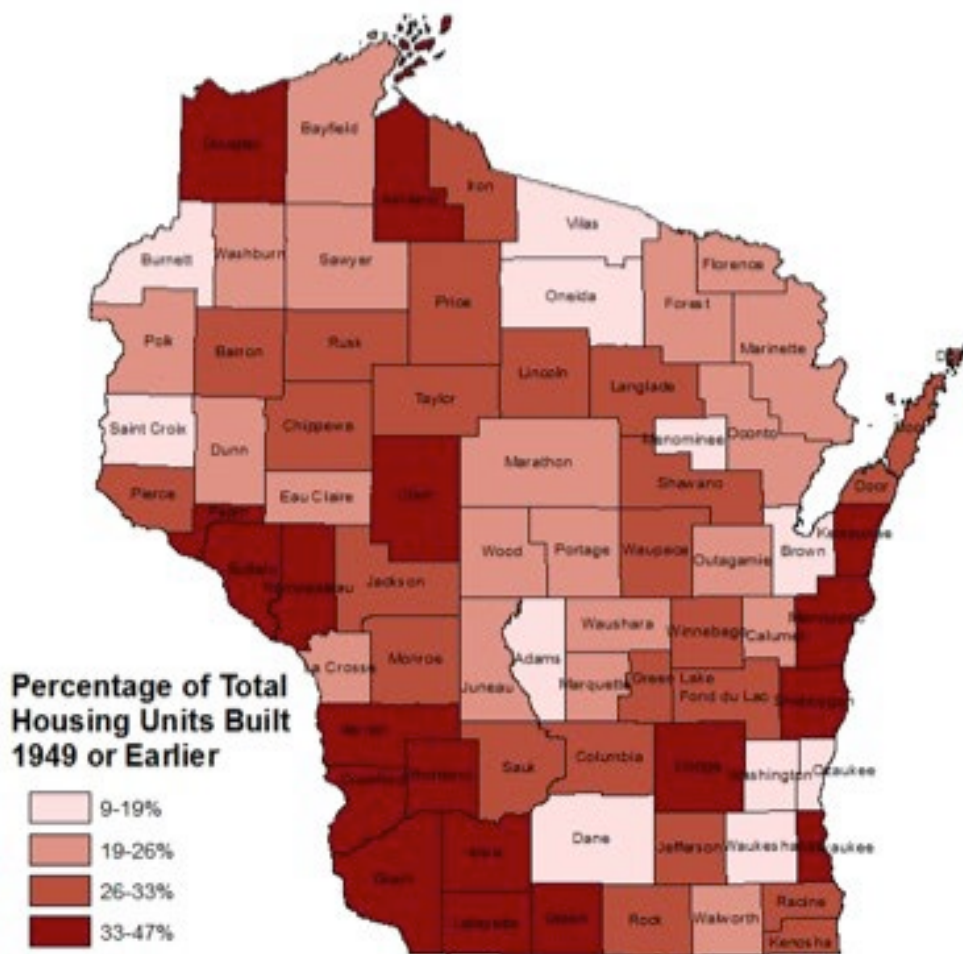
Data Source: 2021 ACS

Table description

The above table shows the age of Wisconsin housing stock. Wisconsin housing stock is older than that of the nation, with 25% of units built 1949 or earlier, compared to 18% in the nation as a whole. Both owner-occupied and renter-occupied housing stock is aging, though this varies by region.

Wisconsin's Aging Housing Stock

The following map shows the percentage of total housing units built in 1949 or earlier by county in Wisconsin. The areas with the largest percentage of aging housing stock are in the southwestern and rural Wisconsin. The areas with the “newest” housing stock are located in the growing metropolitan areas.



Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	956,635	57%	449,033	57%
Housing Units build before 1980 with children present	113,275	7%	77,675	11%

Table 38 – Risk of Lead-Based Paint

Data Source: 2021 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Table description

The above table shows the total number and percentage of units built before 1980, two years after lead based paint was banned in the United States. HUD estimates that three quarters of housing units built before 1980 likely contain some lead-based paint. Lead is a highly toxic metal that causes damage to the brain and vital organs. Children are especially susceptible to these issues and may become lead poisoned by putting contaminated objects or paint chips in their mouth, playing in lead contaminated soil or other environmental exposure.

There is no reliable data for “Housing Units built before 1980 with children present”. According to DHS, statewide surveillance of childhood lead poisoning in Wisconsin has been conducted since 1991 and DHS administers a statewide lead poisoning prevention program. During the years 2001 to 2006, the number of children tested for lead poisoning remained relatively static at about 80,000 tested. From 2007 to 2011 that number annually increased to more than 100,000 children annually. Since then the number of children under age 6 tested for lead started to decline and a total of 86,771 were tested in 2016. Since 2016, the number of children tested has continued to decline, partly due to COVID-19 interruptions. In 2021, 65,064 children were tested for lead exposure. The time trend for the number of children found to be lead poisoned (10 mcg/dL) was on the decline from 2000 to 2014; although in 2020, the prevalence of lead poisoning among children tested dropped to 3.3%. Lead-based hazards continue to be of serious concern in Wisconsin and it is necessary to continue to explore opportunities to address lead-based hazards.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 39 - Vacant Units

Table description

This data is not available at the state level.

Need for Owner and Rental Rehabilitation

Wisconsin is experiencing a significant need for both owner and renter rehabilitation. This need is experienced across Wisconsin but is most acute in northern counties as well as other rural areas where the housing stock is the oldest. Respondents to an online public survey question asking about barriers to affordable housing repeatedly mentioned a need for rehabilitation.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

The following information was compiled by the Wisconsin Department of Health Services:

- Utilizing 2021 Census data, of the 2,449,970 housing units in Wisconsin, there are approximately 1,405,668 pre-1979 housing units in Wisconsin with lead-based paint hazards. This number is derived from the American Healthy Homes Survey, 2021 which estimates that 68.5% of Midwest homes built before 1940 and 48.7% of homes built between 1940-1950 have lead-based paint hazards.
- According to the American Healthy Homes Survey, low to moderate-income households in the Midwest are significantly more likely to live in dwellings with lead hazards than higher income households. The study found that on average, 29% of households with an income less than \$30,000 per year have lead-based paint hazards in their homes compared to approximately 18% of households with incomes greater than \$30,000.
- Utilizing the 2021 Census data overlaying the American Healthy Homes Survey, of the approximately 744,500 low and moderate-income households in Wisconsin, an estimated 215,900 are households with lead-based paint hazards. This number represents half of all households with lead hazards in Wisconsin.

Discussion:

MA-25 Public and Assisted Housing – (Optional)

Introduction:

DEHCR's Consolidated Plan details the public housing needs statewide; however, entitlement cities and counties are required to submit their own five-year Consolidated Plans to HUD. Therefore, more entitlement city and entitlement county-specific public housing data, conditions, revitalization needs, and strategies can be found in the entitlement cities' and counties' respective Consolidated Plans.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	208	12,632	29,393	684	16,454	1,712	521	2,580
# of accessible units			2,295						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 40 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Table description

This table details the number of vouchers and accessible units by public housing program type administered by Wisconsin's 123 Public Housing Authorities. This table uses HUD's prepopulated data collected via Public and Indian Housing Information Center.

Describe the supply of public housing developments:

Information displayed in above chart.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

34 Public Housing Authorities provided narrative responses about the physical condition of their public housing units. The narratives were categorized into four categories (excellent, very good, good/fair, needs improvements/aging). Some narrative responses fit into more than one category. 3 responded “excellent”, 4 responded “very good”, 17 responded “good/fair”, 9 responded “needs improvements/aging.” Two patterns emerged from the narrative responses. First, there are multiple Public Housing Authorities with “very good” or “excellent” housing stock. The second pattern was that many responded that their housing stock was built in 1965-1980 and, despite its age, was in good or fair condition.

HUD’s Real Estate Assessment Center conducts physical property inspections of properties that are owned, insured, or subsidized by HUD. The Public Housing Physical Inspection Scores, compiled in April 2019, indicates that Wisconsin has Physical Inspection Scores ranging from 100 (the best possible score) to 40, with an average score of 84.1. 74 total Public Housing properties were scored in the most recent data compilation released by HUD. Of those properties, 30 scored between 90-100, 23 properties scored in between 80-89, and 21 properties scored 79 or below. This range of inspection scores demonstrates that the majority of Public Housing stock in Wisconsin is in good or very good condition. However, there are some properties that need frequent inspection and in need of improvements.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

HUD’s Real Estate Assessment Center conducts physical property inspections of properties that are owned, insured, or subsidized by HUD. The Public Housing Physical Inspection Scores, compiled in April 2019, indicates that Wisconsin has Physical Inspection Scores ranging from 100 (the best possible score) to 40, with an average score of 84.1. 74 total Public Housing properties were scored in the most recent data compilation released by HUD. Of those properties, 30 scored between 90-100, 23 properties scored in between 80-89, and 21 properties scored 79 or below. This range of inspection scores demonstrates that the majority of Public Housing stock in Wisconsin is in good or very good condition. However, there are some properties that need frequent inspection and in need of improvements.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Information contained in the 123 individual PHA Plans or entitlement city/entitlement county Consolidated Plans.

Discussion:

There are 123 Public Housing Authorities (PHAs) in the State of Wisconsin. Of the 123 Public Housing Authorities, 58 provide low rent units, 27 administer Housing Choice Vouchers (HCV), and 38 are combined low rent units and HCV's. The Division of Energy, Housing and Community Resources is responsible for non-entitlement Annual and 5-Year Public Housing Authority (PHA) Plan reviews, in which DEHCR ensures that the PHA Plan is consistent with the Consolidated Plan. Of the 123 Public Housing Authorities, 17 are within entitlement cities or counties and are therefore not required to submit a PHA Plan to DEHCR for review. At this time there are no Public Housing Authorities designated as "troubled". DEHCR is unaware of any PHA jurisdiction under requirement of a Section 504 Voluntary Compliance Agreement – meaning, DEHCR has not been made aware of a PHA which has received a complaint from an individual who has experienced disability discrimination under Section 504.

MA-30 Homeless Facilities – 91.310(b)

Introduction

Wisconsin's emergency shelter and homeless programs vary from community to community, reflecting individual local needs and resources. Programs and facilities are funded through a combination of local, state, and federal funds, and significant local private cash and volunteer contributions. Four homeless service task groups, known as Continuums of Care (CoC), coordinate local homeless housing and service activities and apply for HUD Continuum of Care Program funding. In addition, Wisconsin Community Action Agencies and other lead agencies coordinate smaller local homeless coalitions for the purpose of Balance of State CoC governance and applying for Emergency Solutions Grant funding.

Nationally and in Wisconsin, the homeless service system has fully embraced the paradigm shift from "housing readiness" to "housing first." Housing readiness is the idea that households should demonstrate that they are ready to be permanently housed by improving income, maintaining sobriety, and/or getting treatment. Housing first focuses on helping households first get into housing, with no conditions. Housing First posits that it is both easier and cost-effective for households to deal with underlying issues while in housing, rather than in shelter or on the streets.

An estimated 30,625 individuals were served by HMIS participating emergency shelters, street outreach, rapid re-housing, permanent supportive housing and transitional housing programs in 2023. HMIS participating emergency shelters provided 920,738 nights of shelter to 19,522 individuals and families in Wisconsin. This translates to an average length of stay of 47 days, which is an increase over the average of 34 days recorded in 2016 for the previous Consolidated Plan. This increase is likely related to the COVID-19 epidemic as well as a reduced housing supply.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	1,880	264	769	1,100	
Households with Only Adults	1,797	224	488	2,667	
Chronically Homeless Households	n/a	0	n/a	1,070	
Veterans	5	0	223	1,256	
Unaccompanied Youth	59	2	55	0	

Table 41 - Facilities Targeted to Homeless Persons

Table description

The above HUD table shows the housing inventory in Wisconsin. Permanent Supportive Housing, an evidence-based practice emphasized by HUD, is a major program type in Wisconsin.

Table description 2

The following table shows the total number of beds in Wisconsin CoCs and local homeless coalitions in 2023, broken up by program type. Emergency shelters account for the largest portion of beds, followed by transitional housing and permanent supportive housing. There is a large diversity in the types of programs available in different Continua of Care. Larger urban continua contain the majority of permanent supportive housing. The service types in local homeless coalitions tend to be dominated by emergency shelter and permanent supportive housing.

Local CoC	Emergency Shelter Beds	Permanent Supportive Housing Beds	Rapid Re-Housing Beds	Safe Haven Beds	Transitional Housing Beds	TOTAL
BOS - Brown CoC	321	265	100	0	116	802
BOS - East Central CoC	46					46
BOS - Central CoC	50		31		9	90
BOS - Coulee CoC	101	180	2			283
BOS - Fox Cities CoC	202	29	35	21		287
BOS - Rural North CoC	43	2	20			65
BOS - Jefferson CoC	1		12		30	43
BOS - Kenosha CoC	80	22	69	42	5	218
BOS - Lakeshore CoC	134		8		8	150
BOS - North Central CoC	61	9	6		6	82
BOS - Northeast CoC	37	22	40		8	107
BOS - Northwest CoC	66	11	19		13	109
BOS - N*Wish CoC	24	17	2		1	44
BOS - Ozaukee	9		14			23
BOS - Rock Walworth CoC	144	26	61		56	287
BOS - Southwest CoC	60		6		66	132
BOS - Washington CoC	31		5		10	46
BOS - Waukesha CoC	125	23	13	2	25	188
BOS - West Central CoC	127	101	17		41	286
BOS - Dairyland CoC	81	31	5	58	53	228
BOS - WinnebagoLand CoC	191	3	47		8	249

Racine CoC	164	107	10		62	343
Milwaukee CoC	805	1,349	252	27	121	2,554
Dane CoC	332	1295	5		158	1,790
TOTAL	3,235	3,492	779	150	796	8,452

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Mainstream services are essential in moving individuals and families out of homelessness. A variety of mainstream services are available to Wisconsin residents, such as Medicaid, SSI, SSDI, SNAP, WIC, Federal-State Unemployment, Public Housing, Section 8, TANF, SCHIP (Badger care), DVR, and Job Center services. Homeless service providers refer clients to mainstream services based on their needs. Homeless persons must qualify based on their income, disability status, and family composition. Representatives from state agencies involved in the provision of these services meet quarterly for Interagency Council meetings to ensure that services are coordinated in a way that best serves homeless persons in Wisconsin.

The PATH program, administered by the Wisconsin Department of Health Services, provides funds to agencies for the purpose of outreach and providing mental health services to homeless persons with mental illness. A range of mental health services may be provided, including screening and diagnosis, community mental health, case management, alcohol and drug treatment, habilitation and rehabilitation, supportive and supervisory services in residential settings, and referral to other services such as health care. Wisconsin has nine PATH providers, located in areas which have a large population of homeless and persons with mental illness.

The Homeless Case Management Services (HCMS) grant program was created through the Temporary Assistance for Needy Families (TANF) block grant program and through Wisconsin Act 59 (statute §16.3085). As such, all funding provided via the grant is subject to TANF rules and regulations. The grant centers on providing families experiencing homelessness intensive case management services across four focus areas. Each year up to 10 annual grants of \$50,000 each will be awarded.

Families entered into the HCMS grant program must be provided intensive case management services focusing on at least one of the following areas:

1. Financial management
2. Employment
3. Ensuring school continuation for children
4. Enrolling unemployed or underemployed parents in W-2 or the Food Share employment and training program

The Employment Grants program was created by statute 16.313, which was passed as part of the 2017-2019 Wisconsin State Budget (2017 Wisconsin Act 19). The goal of the program is to connect people experiencing homelessness with permanent employment and training opportunities. Annual grants are up to \$75,000 and grantees are required to provide at least \$10,000 in cash match. Eligible program participants (clients) are defined as individuals who are 18-years-old or older and part of a household that meets a HUD definition of homelessness (categories 1-4 are eligible).

Per the WI Statute creating this program, grantees must allocate most of the funding for the purpose of paying wages or stipends to program participants. Wages/stipends can be paid to program participants for time spent participating in job/work experience, skills training, company tours, budgeting classes,

time spent doing educational assessments, goal setting, job searches/applications, resume building, cover letter writing, performing mock interviews, going on college/technical school tours, and registering for classes.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

There are several types of programs dedicated to ending homelessness in Wisconsin. Providers were asked to rank program types in the DEHCR online public survey. The results are shown below, from highest priority to lowest priority.

1. Provide rapid re-housing assistance to those experiencing homelessness
2. Provide short-term rental assistance to those at risk of homelessness
3. Expand permanent supportive housing
4. Provide funding for emergency shelters
5. Provide street outreach
6. Provide transitional housing and services

Emergency shelters provide physical shelter to homeless individuals and may consist of brick and mortar shelters, temporary shelters, or motel voucher programs. Many different types of shelters exist, from family shelters, to single men's shelters. Shelters differ widely in the number of services offered, with some providing case management and supportive services aimed at getting homeless households housed, and others only providing a bed and a meal. Motel vouchers are used when shelters are full, or in communities that lack a fixed shelter. Shelters are often the first physical point of entry into the homeless service system.

Safe Havens provide temporary shelter and services to clients experiencing mental illness. Participants typically come from the streets and represent the most difficult to serve population. There are four safe havens in Wisconsin, located in Dane, Waukesha, and Milwaukee counties. Street outreach programs make contact and build relationships with homeless persons on the street. These programs help unsheltered homeless persons connect with resources with the goal of entering permanent, supportive housing.

Homeless prevention programs seek to keep those facing an eviction housed. Preventing evictions is critical to keep individuals and families from becoming homeless. Once households have an eviction on their record, it becomes significantly more difficult to find a landlord willing to rent to them. Homeless prevention also helps households avoid the potential trauma and upheaval associated with an episode of homelessness. In order to use prevention funds most efficiently, it is important that they are targeted towards households with the greatest need.

Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing in the private market. It often involves services to help the household search for and locate affordable housing, and a short to medium term rental voucher to help stabilize the household. The City of Milwaukee has significantly cut its chronically homeless population by pairing rapid re-housing with housing navigators. HUD has emphasized rapid re-housing as an effective practice in reducing homelessness among families.

In the Division of Energy, Housing and Community Resources' online public survey, providers were asked to list the barriers that their community faces in implementing rapid re-housing. A majority of respondents listed a lack of available affordable housing and/or a lack of landlords willing to accept clients with barriers as hindering rapid re-housing programs. These responses point to a need for increased landlord education, with increased resources. Homeless service providers must establish relationships with local landlords to ensure the success of rapid re-housing programs. Providers also listed a lack of funds, and specifically, a lack of funds for staff and supportive services as hindering rapid re-housing programs.

Transitional Housing Programs are designed to provide a structured stay combined with services and case management for up to 24 months. HUD has required providers to shift resources from transitional housing to rapid re-housing and permanent supportive housing as part of a system wide housing first approach. Wisconsin providers still have a limited number of transitional housing beds as they have created or expanded upon rapid re-housing programs in the past five years, funded in part with state funds.

Permanent Supportive Housing provides housing and services designed to allow chronically homeless persons to increase their stability and skillset. It is targeted towards people who face barriers to permanent housing, such as a serious mental illness, substance abuse disorder, or chronic medical problems. National research shows that permanent supportive housing is a cost-effective intervention for the chronically homeless population. Wisconsin does not currently have enough permanent supportive housing capacity to serve all chronically homeless persons due to a lack of available housing, landlords willing to rent to this population and limited case management resources. In addition, community opposition and misconceptions about the homeless population has limited local funding and siting of permanent supportive housing. Without additional permanent supportive housing resources, it is likely that chronic homelessness will continue.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

This section describes, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	20
PH in facilities	0
STRMU	140
ST or TH facilities	0
PH placement	0

Table 42 – HOPWA Assistance Baseline

Data Source: HOPWA 2023 CAPER and HOPWA Beneficiary Verification Worksheet

HOPWA Assistance Baseline Table

This table shows the number and type of units available for people with HIV/AIDS and their families in Wisconsin. This data was gathered from HOPWA Consolidated Annual Performance and Evaluation Report (CAPER) and the HOPWA Beneficiary Verification Worksheet. The table shows that 160 persons living with HIV/AIDS received TBRA and STRMU assistance.

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Elders, frail elders, persons with disabilities:

The Department of Health Services provides a variety of information, services, and support regarding assisted living for elders, frail elders, and people with disabilities. Government entities such as Aging and Disability Resource Centers, the Board on Aging and Long-Term Care, and Independent Living Centers (ILC) provide information and assistance for the elderly, the frail elderly, and people with disabilities. Wisconsin has online list serves of resources for elders, frail elders, and persons with disabilities; those include Senior DECISION, Housing and Architectural Accessibility Resources, and Assistive Technology Resources. The Department of Health Services also offers information on different types of community living arrangements including Community Based Residential Facilities, Residential Care Apartment Complexes, and Adult Family Homes. Additionally, county and tribal aging offices can answer questions regarding elders, frail elders, and people with disabilities in their communities.

The Department of Health Services also provides Supported Living Programs, specifically for elders, frail elders, and people with disabilities. There are multiple programs – such as the Family Care Partnership

Program, Money Follows the Person (MFP), Wisconsin Assisted Living Facilities and Programs, Community Options Program (COP), Community Integration Program (CIP), and Kate Beckett Program – that strive to foster people’s independence, increase their quality of life, and integrate them into their own homes and communities (or assist them in remaining in their community) while recognizing the need for independence and support.

Additionally, many of Wisconsin’s Public Housing Authorities have accessible Public Housing Units designed specifically for elders, frail elders, and persons with disabilities. Some also administer Housing Vouchers with a preference for elders, frail elders, and persons with disabilities.

Persons with Substance Use Disorders:

The Wisconsin Department of Health Services’ Division of Mental Health and Substance Abuse Services has programs to serve those who are dealing with substance use issues that continue to maintain a continuum of prevention and treatment services. Wisconsin’s prevention services include the Alliance for Wisconsin Youth Regional Prevention Centers, the Brighter Futures Initiative (comprehensive prevention and early intervention programming), Parents Who Host Lose the Most (evidence-based environmental efforts), and over \$5 million in Substance Abuse Prevention and Treatment Block Grants. In addition to State funds, Wisconsin relies heavily upon Substance Abuse Prevention and Treatment Block Grants and federal grants, such as the Access to Recovery, the Strategic Prevention Framework – State Incentive Grant, Brief Intervention and Referral to Treatment. Despite these resources, The Wisconsin Substance Abuse Prevention and treatment Block Grant Application noted that the access to behavioral health services is limited in Wisconsin’s rural areas where the demand for treatment exceeds availability of services.

Comprehensive Community Services (CCS) is a state program that provides psychosocial rehabilitation services to citizens that have either an ongoing mental health or substance use need or both. Certified CCS Programs in counties and tribes offer services individualized for each adult and child with mental health or substance use conditions based on their choice. A voluntary program, consumers collaborate with members of their team in selecting services. CCS anticipates that providers will be trained in current best practices. Among current best practices are a few offered through Substance Abuse and Mental Health Service Agency (SAMHSA) that support both system and service practices that are researched and consistent with positive recovery outcomes.

Persons with HIV/AIDS and their families:

In addition to HOPWA grants, the AIDS Resource Center of Wisconsin has housing specialists on staff to assist with different housing challenges that HIV patients confront. Services that the AIDS Resource Center of Wisconsin administers are financial assistance, housing case management, intensive housing counseling, transitional residential housing, and family residential housing.

Public housing residents:

This information was previously reported in MA-25.

Victims of domestic violence, dating violence, sexual assault, and stalking:

The Department of Children and Families provides a variety of services to victims of domestic violence, dating violence, sexual assault, and stalking. The Department of Children and Families Domestic Abuse Program grant programs provide funding for basic services, children’s programming, outreach, support services, tribal programming, programming targeted to refugee populations, and funding for training and technical assistance.

The Department of Children and Families Division of Family and Economic Security provides the following Temporary Assistance for Needy Families funded services to all eligible families, including those experiencing domestic violence:

- Wisconsin Works (W-2) – Provides assessment, employment planning and support, and case management; and in some cases, cash assistance to help families achieve self-sufficiency. All W-2 applicants are provided with educational information about domestic violence and the opportunity to discuss domestic violence related issues that make finding and keeping employment difficult.
- Emergency Assistance Program – Provides a cash payment for rent, security deposits or mortgage to eligible families experiencing homelessness or impending homeless or impending homelessness; Examples would be a family residing in a domestic violence shelter, or a family who may need to leave their current residence due to a domestic violence incident.
- Specialized training for W-2 case managers on assessment, communication and case planning with domestic violence victims.

Mental Illness:

Wisconsin has a county-based mental health system. The Wisconsin Department of Health Services (DHS) oversees a variety of community mental health programs through the county-based system through various survey and certification or prior authorization processes. Certified Outpatient Mental Health Clinics operate either publicly or privately with the state providing the non-federal share to the Medicaid rate. Other programs such as Emergency Mental Health Programs or *Crisis Intervention* (24/7 phone, mobile and walk-in services); quasi Assertive Community Treatment (ACT) programs known as Community Support Programs (CSP); Comprehensive Community Services (CCS) are services counties and/or their contract providers can offer that provide behavioral health services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Elders, Frail elders, Persons with disabilities:

For over 30 years, the Department of Health Services has assisted counties in relocating elders and people with physical and developmental disabilities residing in nursing facilities, Intermediate Care Facilities for Individuals with Intellectual Disabilities, and State Centers for People with Developmental Disabilities into community-based settings. The Division of Long-Term Care operates Medicaid Home and Community-Based Waivers; these waiver programs provide services to eligible frail elders and people with disabilities who meet the functional and financial program eligibility. These include: Family Care, Family Care Partnership, PACE (Program of All-Inclusive Care for the Elderly, IRIS (Include, Respect, I Self-Direct), Community Options Program Waiver, the Community Integration Program Waiver, the Nursing Home Diversion Program, and the Children's Long-Term Support Waivers. These programs assist people who are leaving institutions to secure housing and services to ensure health and safety in the community. Statewide Aging and Disability Resource Centers provide information and assistance services to all elders and persons with disabilities, regardless of eligibility for Medicaid HCB services. This can include referral to a variety of housing resources in the community.

Mental illness:

The Division of Mental Health and Substance Abuse Services works with county agencies that have referred individuals into facilities for treatment to assure their basic needs and mental health/behavioral health follow up care is provided in the community.

Individual Placement and Support (IPS) Supported Employment Programs for persons with severe and persistent mental illness in Wisconsin are dedicated to increasing employment and education opportunities for people with severe mental illness or co-occurring substance abuse disorders. In 2023, 24 counties (Burnett, Calumet, Chippewa, Clark, Crawford, Dunn, Eau Claire, Fond du Lac, Marathon, Lincoln, Langlade, La Crosse, Vernon, Monroe, Washington, Dane, Jackson, Milwaukee, Pierce, Polk, St. Croix, Sheboygan, Pierce, Outagamie, Vernon and Washburn) have established IPS programs serving individuals in their Community Support Program and/or Comprehensive Community Support Program. DHS reports that in 2023, an average of 55% of the individuals in the program worked at some point during the quarter. During the baseline year of implementation, 2011, the quarterly rate was 18.5%.

2013 Wisconsin Act 20 created the Office of Children's Mental Health (OCMH). Reporting directly to the Governor's office, OCMH will assure the coordination and integration of services across state agencies:

- Facilitating communication with all state agencies serving children, coordinating initiatives, and monitoring program performance focused on children's mental health.
- Supporting administrative efficiencies to allow for a reduction in duplication of efforts among state organizations devoted to children's programming.
- Improving access to appropriate services to children, focusing on children's services provided not only by DHS, but also the Department of Children and Families, Department of Public Instruction, the Department of Corrections, as well as other organizations serving children in the State of Wisconsin.
- The office is staffed by a Director appointed by the Governor, and three liaison staff.

Persons Discharged from Adult Institutions and Community Corrections:

According to consultation with the Department of Corrections, The Divisions of Adult Institutions and Community Corrections do not have specific policies that require or ensure that all persons releasing from an institution to community supervision have a residence and will not be homeless. However, they make every attempt to obtain housing for releasing individuals. These agencies pay close attention to the housing needs of certain specialty populations such as the mentally ill offenders, sex offenders and our veterans. The Division of Community Corrections funds/provides multiple housing options such as Halfway Houses, Community and Residential Programs, Transitional Living Placements, and emergency housing to assist offenders in addressing their housing and treatment needs, as well as to provide stability during their transition from incarceration to the community.

Discharge/release plans are developed approximately six months prior to release and are collaboratively crafted by Division of Adult Institutions social workers, Division of Community Corrections field agents, and offenders. Offenders are actively engaged in transitional preparation prerelease module completion which includes the development of a housing plan. Division of Community Corrections Agents review release plans and investigate the proposed residence for appropriateness. If the offender does not have appropriate housing available upon release, the agent may refer the offender to the housing options outlined above. The type of housing and prioritization of placement is determined based on the offender's risk to re-offend and their program/treatment needs.

The Division of Juvenile Corrections plans for the transition of youthful offenders to the community through the Joint Planning and Review Conference process. This planning team includes the Wisconsin Department of Corrections field and institution staff, family members, county representatives, the

youthful offender, and representatives of any involved alternate care placement. This release/transfer plan is reviewed and revised throughout the institutional stay as the youth completes goals and objectives, new treatment needs arise, and other factors change. The goal of the Division of Juvenile Corrections is to place every youth under the age of eighteen in his or her family's home in order to maintain the family unit. However, if the youth is over the age of eighteen it may be in his/her best interest to pursue placement in an independent living setting. The Division of Juvenile Corrections is committed to funding Alternate Care Placements and Transitional Independent Living Programs as deemed appropriate by the Joint Planning and Review Conference.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Elders, Frail elders, Persons with disabilities:

The HOME Tenant Based Rental Assistance (HOME TBRA) program provides rental assistance lasting up to 24 months with a possible 24-month extension. HOME TBRA may only be provided to households with incomes at or below 80% CMI.

The Wisconsin Department of Health Services administers the following programs that help people reentering the community find housing.

Independent Living Centers (ILCs)

The Department provides funding to ILCs, which serve people with disabilities, and can assist them with finding accessible and/or affordable housing. ILCs also assist people with disabilities and older adults remain in their home by doing an assessment of home and recommending home modification, durable medical equipment (DME), and/or assistive technology (AT) making it possible for the individual to remain in their home. ILCs also work with people with disabilities transition from a nursing home back into housing in a community setting. There are currently eight ILCs located throughout Wisconsin offering county-specific information and resources.

Aging and Disability Resource Centers (ADRCs)

ADRCs are state funded, county operated centers located throughout Wisconsin. They provide accurate, unbiased information on a broad range of programs and services relating to aging or living with a disability. They help people understand the various long-term care options available, assist individuals with applications for programs and benefits, and serve as the access point for publicly funded long-term care.

Medicaid Home and Community Based Waiver (HCBW) Programs

HCBW programs include Family Care, Family Care Partnership and IRIS. These programs provide care management and services to ensure that eligible individuals leaving institutions have the services they need. While HCBW programs cannot pay rent or room and board costs, people are assisted to return to existing homes or to find a new home. Programs may pay for some transitions services from the institution including accessibility modifications as needed.

Section 811 Vouchers

Section 811 Vouchers are project-based rent subsidy vouchers available to non-elderly people with disabilities. The Wisconsin Housing and Economic Development Authority administers the vouchers, but DHS is a partner and manages the waitlist. People leaving institutions are a priority group for these vouchers, but the fact that they are associated with specific projects means that they are not available statewide.

Community Recovery Services

For individuals that have been placed by counties in Winnebago Mental Health Institute for an emergency detention, counties are responsible to work with the institution to find an appropriate aftercare plan that includes assuring the individual has a place to live and aftercare mental health follow-up services. Depending on the individual's needs, risks, and resources, the county may provide supports that include services in residential settings.

If the client is on Medicaid and needs ongoing mental health or substance use disorder treatment, they may qualify for a psycho-social rehab benefit, such as Comprehensive Community Services or Community Recovery Services. Those programs can provide residential supports as needed for the individual. However, Medicaid cannot pay for room and board in either program. If housing room and board assistance is needed, county care managers are responsible to assist individuals with finding suitable housing. Some counties may also assist high risk individuals by paying for residential room and board costs with county funding. In addition, counties receive Community Mental Health Block Grant (MHBG) that includes a provision that allows them to use the funding for supportive housing. The block grant also requires them to prioritize people with a serious mental illness who may be homeless.

Persons with Substance Use Disorders:

In order to work to improve the understanding about mental and substance use disorders, to promote emotional health and the prevention of substance abuse and mental illness, increase access to effective treatment, and support recovery, Wisconsin committed to a reasonably good fit between Substance Abuse and Mental Health Services Administration's Strategic Priorities and Wisconsin priorities, indicators, and program initiatives. A 3-year plan was developed, as part of the Substance Abuse Prevention and Treatment Block Grants application, which addressed twelve priorities involving systems improvement and specific initiatives. Of the twelve emphasis areas, there are some initiatives that are directly relevant to housing and community development, those are: Workforce Development initiatives, improve diversity efforts to enhance activities with special populations, integration of mental health and substance use disorders in primary health care, and improve treatment across the lifespan for effective age-specific intervention and treatment.

As American Indian and Alaska Native Tribal governments are sovereign governmental entities, Wisconsin has an active partnership with eleven federally recognized Wisconsin tribes called the Tribal State Collaborative for Positive Change which is supported through system change efforts in the Community Mental Health Services Block Grant and the Wisconsin Native American Prevention Counsel and funded with the Strategic Prevention Framework-State Incentive Grant. The Tribal State Collaborative for Positive Change is a viable avenue for training, feedback, dialogue, and collaboration

and Wisconsin believes that more deliberate efforts toward this collaborative role are needed to address issues of alcohol and drug addiction in Wisconsin.

Persons with HIV/AIDS and their families:

The Division of Energy, Housing and Community Resources will continue to administer the state HOPWA grant. Assistance is provided as follows: approximately 40 percent for rental assistance, approximately 30 percent for housing counseling, approximately 20 percent for supportive services associated with housing, 7 percent for project sponsor administration and 3 percent for the Division of Energy, Housing and Community Resources.

Substance Abuse Prevention and Treatment Block Grants funds continue to fund HIV prevention education services targeted towards substance abusers and their sexual and/or needle sharing partners living in the Milwaukee, Wisconsin area. This service was contracted through the Wisconsin Division of Public Health's HIV Prevention Program.

Victims of domestic violence, dating violence, sexual assault, and stalking:

Department of Children and Families recommendations to meet the critical needs of Wisconsin citizens include, Domestic Violence:

- Continued stable funding for domestic abuse shelters as a critical, live-saving, and confidential safety net for survivors who need an immediate safe haven from an abuser.
- Programming that can get survivors quickly into safe, affordable, and permanent housing, when appropriate, while continuing to provide survivor-driven advocacy services that address barriers and challenges.

This paired model has had significant success rates in reducing homelessness and increasing safety.

The Governor's Council on Domestic Abuse developed the *2014-2020 Long Range Plan for a Safe Wisconsin* which aims to end domestic abuse in Wisconsin. The plan outlines six main priorities: 1) Maintain, strengthen and expand core services, 2) enhance services and prevention education for children and youth, 3) strengthen outreach and education to Wisconsin communities, 4) expand programming that is community driven in culturally-specific and lesbian, gay, bisexual, or transgender (LGBT) communities, 5) address the civil legal needs of domestic violence victims and their children, and 6) focus on promising strategies and practices.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not applicable.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

During the development of the 2025-2029 Consolidated Plan, DEHCR consulted with the Public Service Corporation of Wisconsin (PSC), the regulatory body of utilities and related service provision in Wisconsin. As part of its role, the PSC works directly with broadband internet providers to encourage additional service in under-served portions of the state and to obtain information about usage, coverage, and capabilities.

To identify the broadband needs for low- and moderate-income (LMI) household, the PSC's Broadband Office performed geospatial analysis to identify areas that lacked certain levels of broadband coverage that also intersected with LMI census block groups.

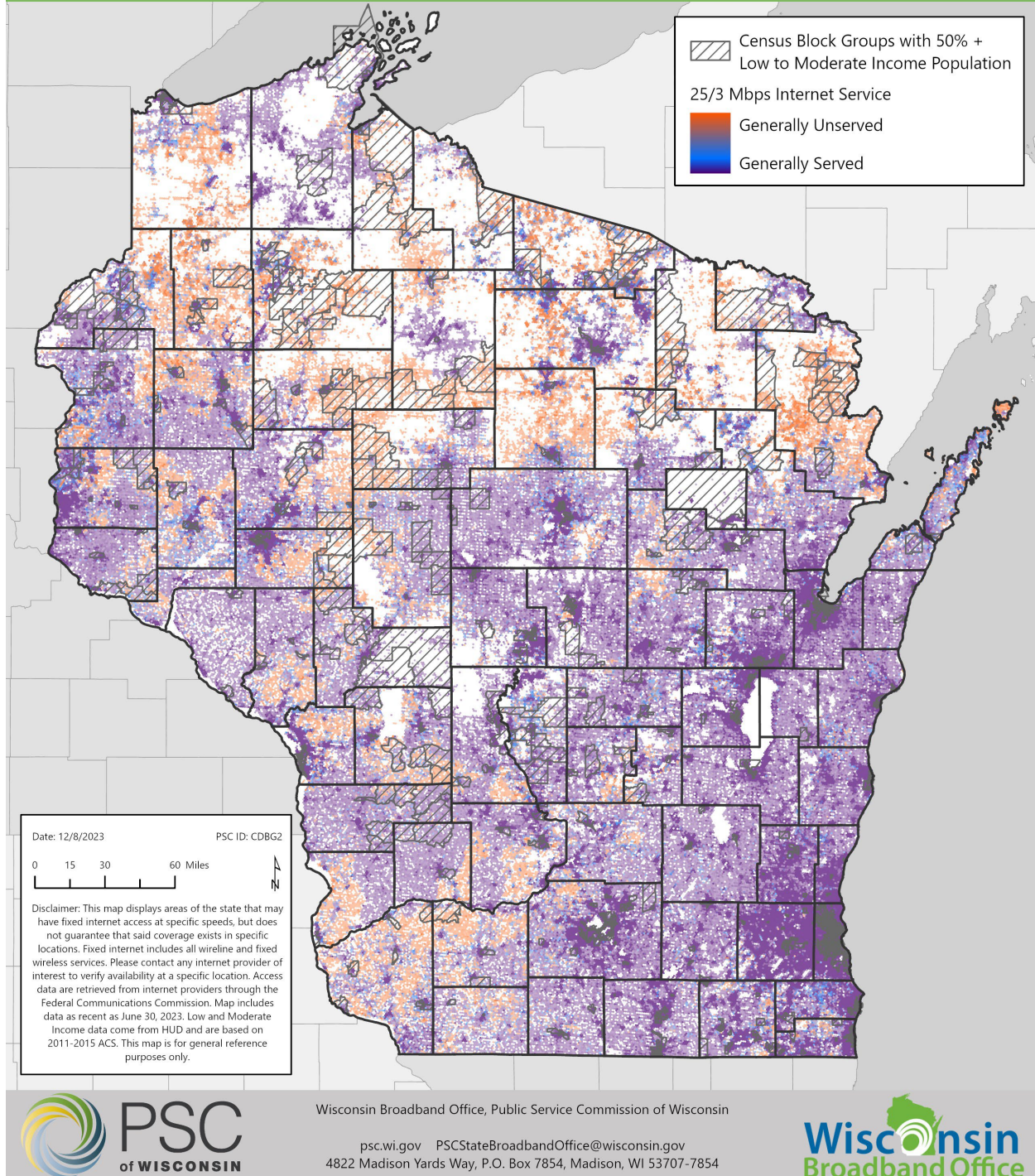
The maps included below display Community Development Block Grant (CDBG) Low to Moderate Income Population Block Groups. They also show fixed internet coverage data from as recent as June 30, 2024. Fixed internet access data includes all wireline and fixed wireless services. Access data are retrieved from internet providers and the Federal Communications Commission's Form 477. Low- and Moderate-Income Area Data come from the U.S. Department of Housing and Urban Development (HUD) and are based on the 2021-2023 American Community Survey (ACS).

- Areas Lacking Two Fixed Providers Providing 25 Mbps Download and 3 Mbps Upload
- Areas Lacking Fixed Service at 100 Mbps Download and 20 Mbps Upload
- Areas Lacking Fixed Service at 10 Mbps Download and 1 Mbps Upload

The information contained in the maps may be utilized by DEHCR when evaluating opportunities to invest CDBG resources to expand broadband internet coverage in Wisconsin.

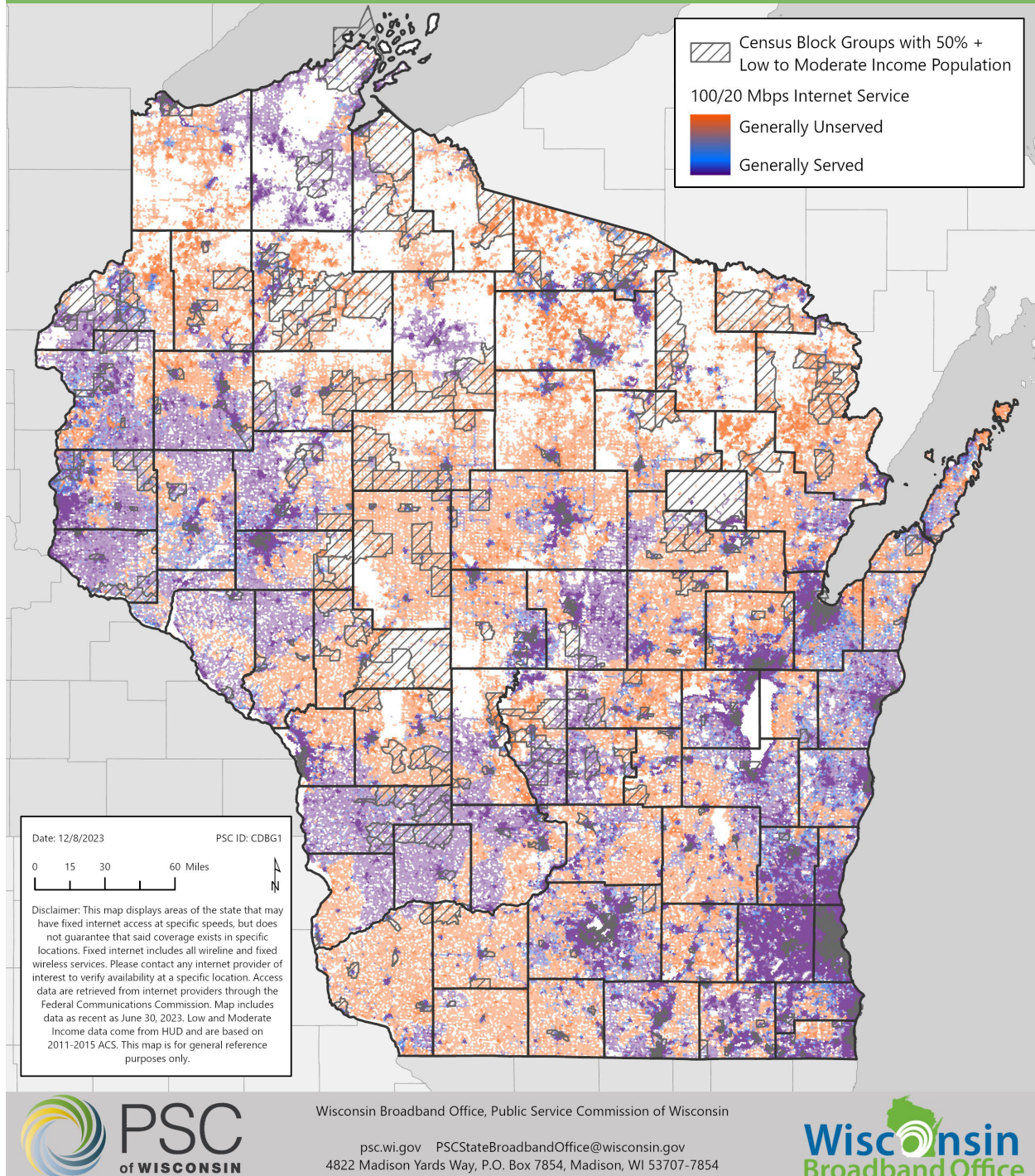
COVERAGE STATUS FOR 25/3 SERVICE WITH CDBG-BASED LOW-MODERATE INCOME AREAS

Presented by the Wisconsin Broadband Office



COVERAGE STATUS FOR 100/20 SERVICE WITH CDBG-BASED LOW-MODERATE INCOME AREAS

Presented by the Wisconsin Broadband Office



Also during the development of the 2025-2029 Consolidated Plan, DEHCR consulted with the Wisconsin Department of Natural Resources, the agency whose responsibilities include the management of flood prone areas, public land and water resources. DNR staff have not, to date, assessed the vulnerability of housing to increased natural hazard risks associated with climate change. The DNR did cite the following studies on the subject that could be utilized by the Department to identify and mitigate the risks to housing to increased natural hazard risks associated with climate change.

- The Department of Health Services' 2016 Wisconsin Climate and Health Adaptation Plan (www.dhs.wisconsin.gov/publications/p01447.pdf) addresses health equity and includes discussion of the effects of climate change, including weather hazards, on vulnerable populations. The plan includes adaptation strategies for flood vulnerability, extreme heat, drought, winter weather, and vector-borne diseases. These strategies are based on various analyses. For example, DHS has completed a Fox River Valley flood mapping project and developed heat vulnerability index maps and reports.
- The December 2018 issue of the Cornell Institute for Public Affairs' online Cornell Policy Review (www.cornellpolicyreview.com) includes an article on "Impacts of Climate Change on Disadvantaged Communities: The Case of Lincoln Creek and Northern Portions of the 30th Street Corridor in Milwaukee."
- Professor Katherine Curtis and her colleagues at UW-Madison's Department of Community and Environmental Sociology have worked in this area. A recent National Science Foundation-funded project, "Projecting Future Demographic Trends for Populations Vulnerable to Climate Variability and Land Use Change in the Yahara Watershed," allowed them to look at vulnerable populations in the Yahara Watershed:
- Dr. Curtis also published a 2011 paper on "Understanding the Demographic Implications of Climate Change: First Estimates of Localized Human Impacts of Sea Level Rise" in the journal *Population and Environment* (33(1):28-54) that may be relevant for developing analytical approaches.

To date, the DNR has not conducted research specific to housing vulnerability/ impacts due to natural hazard risks; however, the Department states "...it could be feasible to use geographic information systems (GIS)-based analysis to overlay household income data with 'flood prone' or other natural hazards areas." Such an analysis could incorporate climate change projections to strengthen the risk analysis. DEHCR anticipates working collaboratively with the DNR to further understand what resources the two agencies share that could be utilized to identify the vulnerability of housing to increased natural hazard risks associated with climate change.

Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing varies widely throughout the State and is typically affected by local policies over which the state has little control. Wisconsin's tradition of "home rule", embodied in the State

Constitution, means that 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, workforce 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. For example, a number of communities in Wisconsin, particularly in suburban areas around larger cities, impose impact fees on new residential development in the effort to cover broad-based costs for improvements and public facilities that can (potentially) slow down a boom in new housing starts. The State Legislature, in 1994, passed an act to develop more regularity in impact fees across its communities, with an allowance made for communities to waive impact fees for low-income housing. In 2017, the State Legislature passed Act 243 which requires municipalities to report to the Department of Administration by January 1, 2020 an analysis of its residential development regulations and the financial impact each has on the cost of each new subdivision. Other steps have been taken as well in fast-growth areas, such as increasing lot sizes and setbacks and establishing minimum square foot requirements for new residences. The state’s “home rule” provisions mean that zoning ordinances are left to the judgment of local governments; however, 2017 Act 243 requires municipalities to identify ways in which it can modify regulations to meet housing demand.

An extended analysis of the impact of state laws and regulations upon affordable and fair housing in Wisconsin can be found in DEHCR’s Analysis of Impediments to Fair Housing Choice. Topics covered that may include analysis of the effects of public policies on affordable housing include:

- Local Land-Use Regulations
- Blighted area, urban redevelopment, and urban renewal laws
- Local housing authority laws
- Comprehensive planning laws
- Tax incremental financing laws
- Zoning laws
- Impact Fees
- WHEDA statewide tax deferral and abatement programs
- Property tax deferral program
- Homestead credit
- Supplement to the federal historic rehabilitation credit

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

This section analyzes Wisconsin's non-housing community development and economic development needs. Measuring Wisconsin's economic conditions is difficult as many of the state's economic characteristics – for example, HUD's categories: business by sector, labor force, occupations by sector, and educational attainment – vary by geographical region.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Share of Workers %
Agriculture, forestry, fishing and hunting, and mining	48,777	2
Arts, Entertainment, Accommodations	82,412	4
Construction	142,501	7
Education and Health Care Services	440,309	21
Finance, Insurance, and Real Estate	155,380	7
Information	30,579	1
Manufacturing	453,101	22
Other Services	69,670	3
Professional, Scientific, Management Services	194,767	9
Public Administration	92,603	4
Retail Trade	190,079	9
Transportation and Warehousing	113,961	5
Wholesale Trade	62,180	3
Total	2,076,320	--

Table 43- Business Activity

Data Source: 2021 ACS

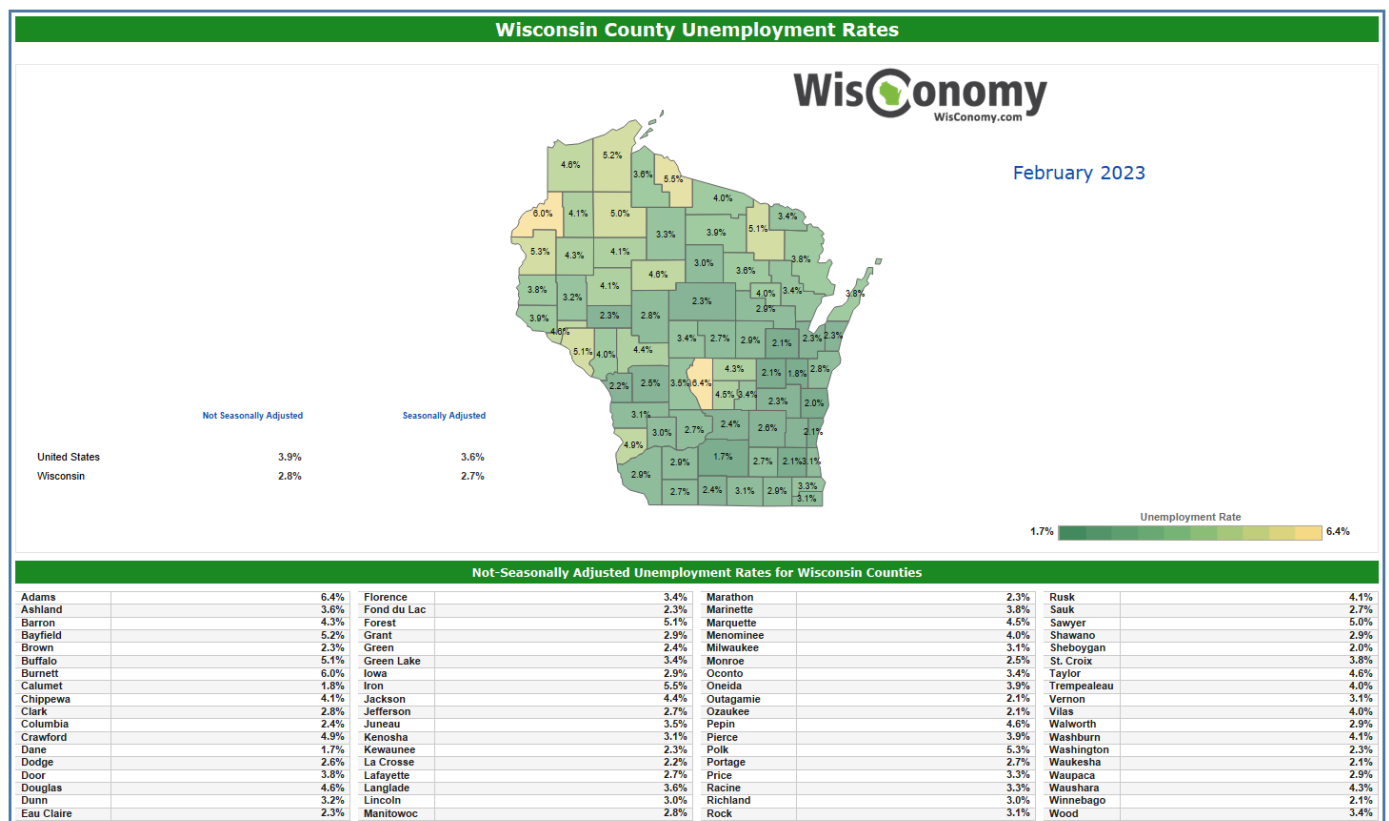
Table description

The above table provides data regarding the major employment sectors of Wisconsin.

Labor Force

The map below presents the state's unemployment rates by counties as opposed to the previous regional grouping. This county unemployment map shows that the North region has 10 of the state's top 14 counties with the highest rate of unemployment.

Wisconsin County Unemployment Rates



DETI-17241-P (R. 03/2023) WI Dept. of Workforce Development, Labor Market Information 03/29/2023

Labor Force

Total Population in the Civilian Labor Force	4,769,319
Civilian Employed Population 16 years and over	3,101,184
Unemployment Rate	3.5
Unemployment Rate for Ages 16-24	6.95
Unemployment Rate for Ages 25-64	3.08

Table 44 - Labor Force

Data Source: 2021 ACS

Occupations by Sector	Number of People
Management, business and financial	484,087
Farming, fisheries and forestry occupations	25,202
Service	443,972
Sales and office	569,596
Construction, extraction, maintenance and repair	265,809
Production, transportation and material moving	531,015

Table 45 – Occupations by Sector

Data Source: 2021 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	2,150,106	73.0%
30-59 Minutes	662,704	22.5%
60 or More Minutes	135,486	4.6%
Total	2,948,296	100%

Table 46 - Travel Time

Data Source: 2021 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	107,487	7,786	75,236
High school graduate (includes equivalency)	592,973	24,679	204,169
Some college or Associate's degree	778,090	24,974	166,461
Bachelor's degree or higher	902,706	15,944	118,995

Table 47 - Educational Attainment by Employment Status

Data Source: 2021 ACS

Educational Attainment by Age

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	11,272	13,757	20,491	33,813	29,894
9th to 12th grade, no diploma	47,317	27,596	26,983	67,869	52,671
High school graduate, GED, or alternative	195,194	183,252	179,918	459,378	399,808
Some college, no degree	191,494	151,054	140,657	306,477	196,128
Associate’s degree	27,333	84,301	97,719	190,393	88,702
Bachelor’s degree	65,648	205,618	188,284	314,097	168,468
Graduate or professional degree	6,706	72,321	93,851	164,263	119,576

Table 48 - Educational Attainment by Age

Data Source: 2021 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$30,530
High school graduate (includes equivalency)	\$36,530
Some college or associate degree	\$42,701
Bachelor’s degree	\$58,745
Graduate or professional degree	\$70,880

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2021 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

The three leading employment sectors for the State of Wisconsin are Education and Health Care Services, Manufacturing, and Retail Trade. These three sectors employ a combined 52% of the Wisconsin labor force. The Information sector is the smallest.

Describe the workforce and infrastructure needs of business in the state.

The state’s skilled industries report workforce deficits. Though it is unclear whether these deficits are due to a skills gap (in either quantity and/or quality) or other factors, Wisconsin’s work force may need to adapt to changing demands. According to the Department of Workforce Development (DWD), employers from every industry and key occupation consistently say they are looking for skilled workers. Skilled workers are at a premium and, consequently, employers aggressively recruit talent from the same labor pool. More employers have indicated that they are adopting incumbent worker training

programs to "up-skill" their existing workforce. Others are implementing retention programs to retain skilled workers. Still, many employers continue to express frustration over challenges associated with the recruitment and retention of workers who have the skills needed to fill openings. A lack of available, affordable housing is a major challenge for employers statewide and represents one of the greatest needs for Wisconsin's workforce. Workforce supply challenges will quickly become greater as Boomers are moving out and the labor force participation rate may be essentially maximized. Our projections for Wisconsin's workforce show essentially no growth by 2030 – seven years from now. The sheer size of the Boomers segment will overtake population growth (natural or migration) in the upper Midwest in the foreseeable future. One response by employers has been to recruit as many workers as possible, including those with skills other than those the employer needs, and train them to their individual maximum potential. While this addresses the near-term need, it is expensive to achieve.

Transportation, especially in rural areas of the state, is a growing need, and is cited as a barrier to reaching full employment. The map above clearly illustrates higher levels of unemployment in rural, northern counties where access to reliable transportation is a hindrance on employment. Next to housing, transportation is frequently cited as barrier among employers in Wisconsin. Data from the American Census Survey shows that travel times have increased since 2007-2011 data. Utilizing 2007-2011 data, on average, 16% of workers travel 30-59 minutes to work while 3% travel over 60 minutes to work. 2021 data shows those percentages increased to 22.5 %and 4.6% respectively.

Individuals with lower incomes have disproportionate transportation needs; it is therefore important that barriers to transportation be addressed so that workers have access to employment centers. Studies have shown that improvements to infrastructure have a direct correlation to job growth. People experiencing housing vulnerability, for example veterans, victims of domestic abuse, and persons with disabilities, need supportive services to increase the feasibility of attaining and keeping employment.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Some employers are saying that the lack of skilled workers is constraining their ability to increase business or market share. They are also "modernizing", e.g. buying the latest technology, to automate operations and reduce operating costs to stay competitive while supplanting the dependency upon skilled workers. This approach often brings new labor issues, i.e. finding technology fluent employees or matching existing workforce with technology requirements. This is not a new phenomenon, but the speed of technological advancement coupled with the slowing growth of the workforce has combined to make it an acute problem in certain regions and industry sectors.

Workforce strategists are now adopting "demand-driven" models to enable employers to direct targeted education and training initiatives. Models that work bring employers, educators and workforce partners together to define training programs and apply for state grants to develop and deliver training

to unemployed, under-employed or incumbent workers. Employers are actively collaborating to access or develop the skilled talent required to sustain and grow their business.

According to the Wisconsin Realtors Association Falling Behind report:

“We are not building enough new housing units to keep up with demand, and we are not building enough housing for our growing workforce. Our existing housing stock is aging faster than most neighboring states.

Construction costs are rising faster than inflation, and regulations often drive up the cost of housing. The result of this workforce housing shortage has been declining homeownership, particularly among younger-adults, first-time homebuyers and African American and Hispanic families. The result of this workforce housing shortage also has been rising housing costs, with rents rising faster than incomes. And the results of this workforce housing shortage have been particularly hard on workers at the lower end of the wage scale.

On most of the housing indicators presented in this report, we are falling behind neighboring states. The shortage of workforce housing makes it harder for businesses to recruit or retain workers and harms our economic competitiveness. If workers are unable to find decent, affordable homes near where they work, they either have to live further away and travel long distances or pay a higher portion of their income for housing. Some workers might leave the state altogether, or never come here.”

How do the skills and education of the current workforce correspond to employment opportunities in the state?

According to the Wisconsin Department of Workforce Development, the following are the occupational projections for Wisconsin’s workforce from 2020-2030:

2020-2030 Major Group Long Term Occupational Projections



Annual Total Openings

360,835



19,122

Wisconsin - Total Openings: Growth, Transfers, Exits

207,559

134,154

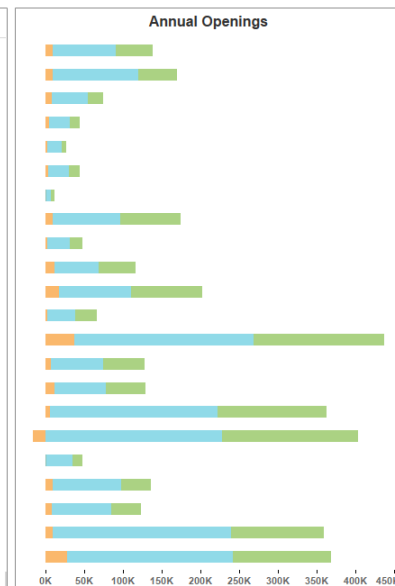
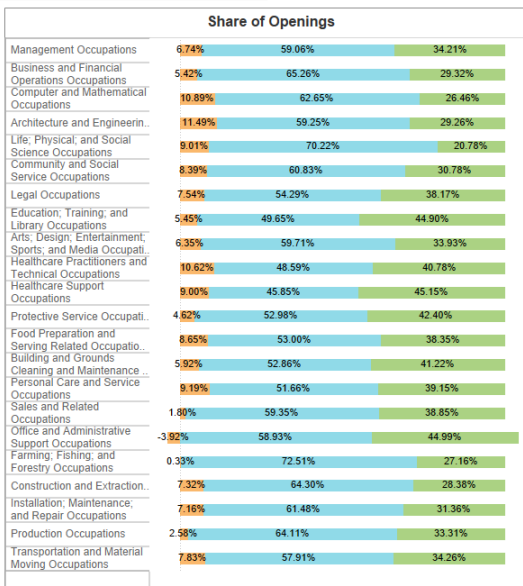
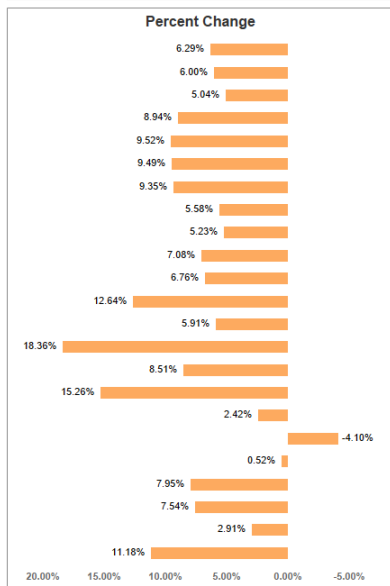
Projected Growth Rate

6.02%

Annual Total Growth Annual Separation Transfers Annual Separation Exits

Area

Wisconsin



The Department offers the following resources to help Wisconsin's workforce obtain the skills necessary to meet the needs of employers:

APPRENTICESHIP

Apprenticeship combines on-the-job training and specialized classroom training. There are over 250 apprenticed occupations in Wisconsin.

DISLOCATED WORKER

Dislocated Worker Programs help both workers and employers when staff reductions, business closings and mass layoffs occur. Assistance is available to all unemployed workers. Additional help may be available to qualifying "dislocated workers" if they have been laid off, received a notice of termination or layoff, or were self-employed and are now unemployed due to economic conditions or natural disaster.

GED and HSED

GED and HSED programs can open doors to the world of work. For those who have not completed high school, a General Educational Development (GED) or High School Equivalency Diploma (HSED) may be required by employers.

INDIVIDUAL TRAINING ACCOUNTS

Individual Training Account vouchers for training are available for eligible persons through the federal Workforce Innovation and Opportunity Act (WIOA).

JOB CORPS

Job Corps is a no-cost, residential training program for youth 16-24 who meet low income and other eligibility criteria.

VOCATIONAL REHABILITATION

Vocational Rehabilitation programs can help workers with re-training if they have been hurt or have work related limitations.

W-2

Wisconsin Works (W-2) provides support to cope with unemployment for families with children. W-2 is based on work participation and personal responsibility. Under W-2, there is no entitlement to assistance, but there is a place for everyone who meets eligibility requirements and is willing to work to their ability or learn skills to achieve sustainable employment. The program is available to low-income parents with minor children, and may provide support programs such as childcare assistance, Food Share and other work supports.

WIOA YOUTH

The WIOA Youth Program is a comprehensive, year-round programs for at-risk youth and young adults 14–24 years old. The program is administered by local Workforce Development Boards which contract with youth service providers to provide the required program elements. Participants have access to tutoring, study skills training, alternative secondary school services, paid and unpaid work experiences, occupational skills training, leadership development opportunities, supportive services, adult mentoring, comprehensive guidance and counseling, financial literacy education, entrepreneurial skills training, and activities to help prepare one for and transition to post-secondary education and training.

YOUTH APPRENTICESHIP

Youth Apprenticeship is for high school students who want to experience hands on learning at the worksite in conjunction with classroom instruction. Youth Apprenticeship is an element of Workbased Education objectives in Wisconsin.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

The following are the primary programs operated through DWD to address the needs of poverty –level families in Wisconsin:

- **Federal Workforce Innovation and Opportunity Act (WIOA).** WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.
- **Federal Wagner Peyser Act:** Funds Job Service staff throughout the state to work within the Job Center system, to provide a wide range of services to both job seekers and employers. A primary function is to support the public labor exchange to match job seekers and employers together. As part of this, staff provide a wide range of job seeking assistance, including helping with resume development, interview skills, referrals to other services that may benefit them, and providing intake services to determine programs for which they may qualify for, to receive additional assistance, including public assistance programs, tax credit programs, etc.
- **Job Centers:** DWD supports our statewide Job Center system. Within these facilities, a variety of employment and training agencies come together to provide coordinated services to a wide range of job seekers and employers. Typical entities housed within these buildings include Job Service, WIA staff, County Human Services staff, Tech school staff, Community Based organizations, Veterans staff, Vocational Rehabilitation, Apprenticeship, and Labor market Information. Through our IT based computer resource rooms, job seekers use our tools and services to aid in their job search and/or retraining efforts.

Describe any other state efforts to support economic growth.

- New Markets Tax Credits, distributed by the Wisconsin Housing and Economic Development Authority (WHEDA), serve as a resource to help fuel job creation and economic development efforts by promoting equity investment in low-income urban and rural communities.
- The Historic Tax Preservation credit was reinstated and doubled, allowing for additional financial assistance to entities willing to utilize historic areas throughout the state for their business endeavors.
- WHEDA's Home Improvement Advantage Program, which provides financing for improvements to existing homes. Eligible improvements include remodeling, home repair, making a home handicap accessible, purchasing energy-efficient appliances, and energy efficiency improvements. Loans may be for up to \$15,000 and have a maximum term of 15 years. Income limits are based on county median income, ranging from \$75,000 to \$95,000 for 2018. Eligible recipients must have a minimum credit score, no delinquent mortgage payments, and mortgage debt that does not exceed 110% of home value.
- Grants to increase the Science, Technology, Engineering, and Mathematics program (STEM) in K-12 education have been increased.
- Increased focus on improving major transportation routes throughout major employment sectors.
- Providing subsidies to low-income populations to gain access to broadband services.

- Governor’s Council on Domestic Abuse created to assist in the prevention of domestic violence and the consequences stemming from it to better serve the employment needs of survivors.
- Through initiatives put forth by the Department of Natural Resources (DNR), the state offers the Safe Drinking Water Loan Program (SDWLP) and Clean Water Fund Program (CWFP). A small portion of the loan awards are principal forgiveness loans and do not have to be repaid. These programs help prevent the serious health and environmental hazards that lead to health problems that keep people out of work.
- The Department of Veteran’s Assistance offers the Veterans Housing Program which provides job training.
- Wisconsin Economic Development Corporation (WEDC) provides programs such as Capital Catalyst, Seed Accelerator, Special Project Loan Fund and the Business Opportunity Loan Fund helping establish gap financing to entrepreneurs and businesses that are looking to invest.

Discussion

The programs enacted by the state show great promise, but focus may need to be redirected to areas that perform below the baseline for maximum growth/economic potential. Transportation, skills improvement and education, and other factors that may be limiting job hiring need to be explored to determine their impact on the economic/community development needs of the state. Education, income, and employment gaps are widening in Wisconsin’s rural areas.

MA-50 Needs and Market Analysis Discussion

Are there any populations or households in areas or neighborhoods that are more affected by multiple housing problems? (include a definition of "concentration")

This Consolidated Plan is for a state grantee. Wisconsin has multiple and varying housing and non-housing challenges, which vary from region to region. Projects and activities funded through the Division of Energy, Housing and Community Resources' method of distribution are selected to meet local market needs and the Division of Energy, Housing and Community Resources' goals and strategies. Concentration of housing problems exist when area households experience multiple housing problems at a greater rate (10% or more) than households. As identified above, households with very low incomes coupled by a lack of available, affordable housing statewide make it difficult for renters or potential homeowners to improve their housing conditions. DEHCR has funded new construction and rehabilitation of affordable housing for persons of very low, low, and moderate-income for several decades so housing and neighborhood conditions have improved, but still remain to be addressed.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The Consolidated Plan is for a state grantee. Wisconsin's diversity varies by region, and there are numerous areas across the state with concentrated racial or ethnic minority or low-income families. The needs of these groups vary based on the region. The Division of Energy, Housing and Community Resources' methods of distribution are designed to be flexible enough to address the needs specific to each local market.

What are the characteristics of the market in these areas/neighborhoods?

Not applicable.

Are there any community assets in these areas/neighborhoods?

Not applicable.

Are there other strategic opportunities in any of these areas?

Not applicable.

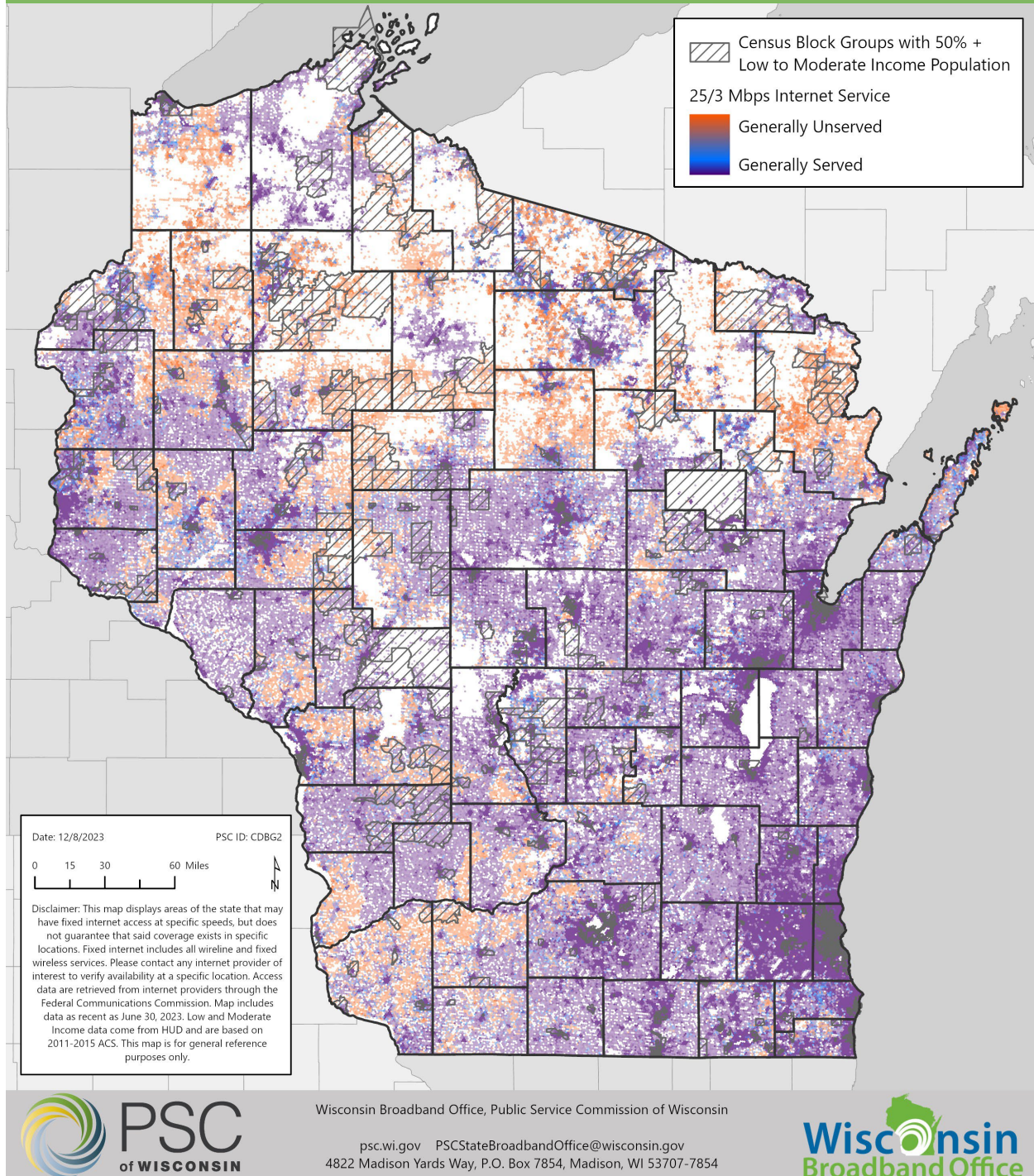
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households – 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The Wisconsin Public Service Corporation (WIPSC), Broadband Office performed geospatial analysis to identify areas that lacked certain levels of broadband coverage that also intersected with LMI census block groups. The WIPSC overlaid Community Development Block Grant (CDBG) Low to Moderate Income Population Block Groups overlaying fixed internet coverage data. Broadband internet access data are retrieved from internet providers and the Federal Communications Commission's Form 477.

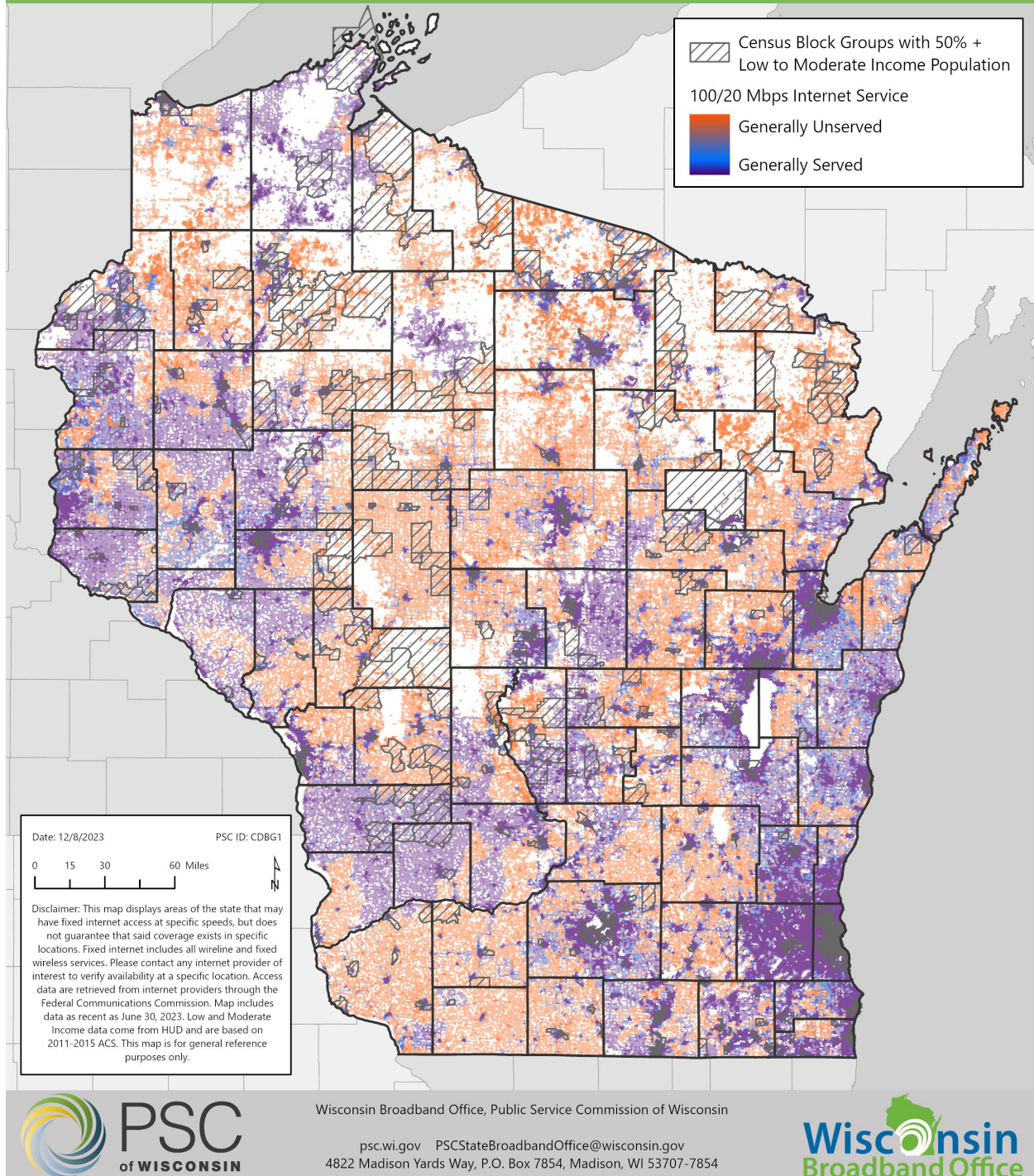
COVERAGE STATUS FOR 25/3 SERVICE WITH CDBG-BASED LOW-MODERATE INCOME AREAS

Presented by the Wisconsin Broadband Office



COVERAGE STATUS FOR 100/20 SERVICE WITH CDBG-BASED LOW-MODERATE INCOME AREAS

Presented by the Wisconsin Broadband Office



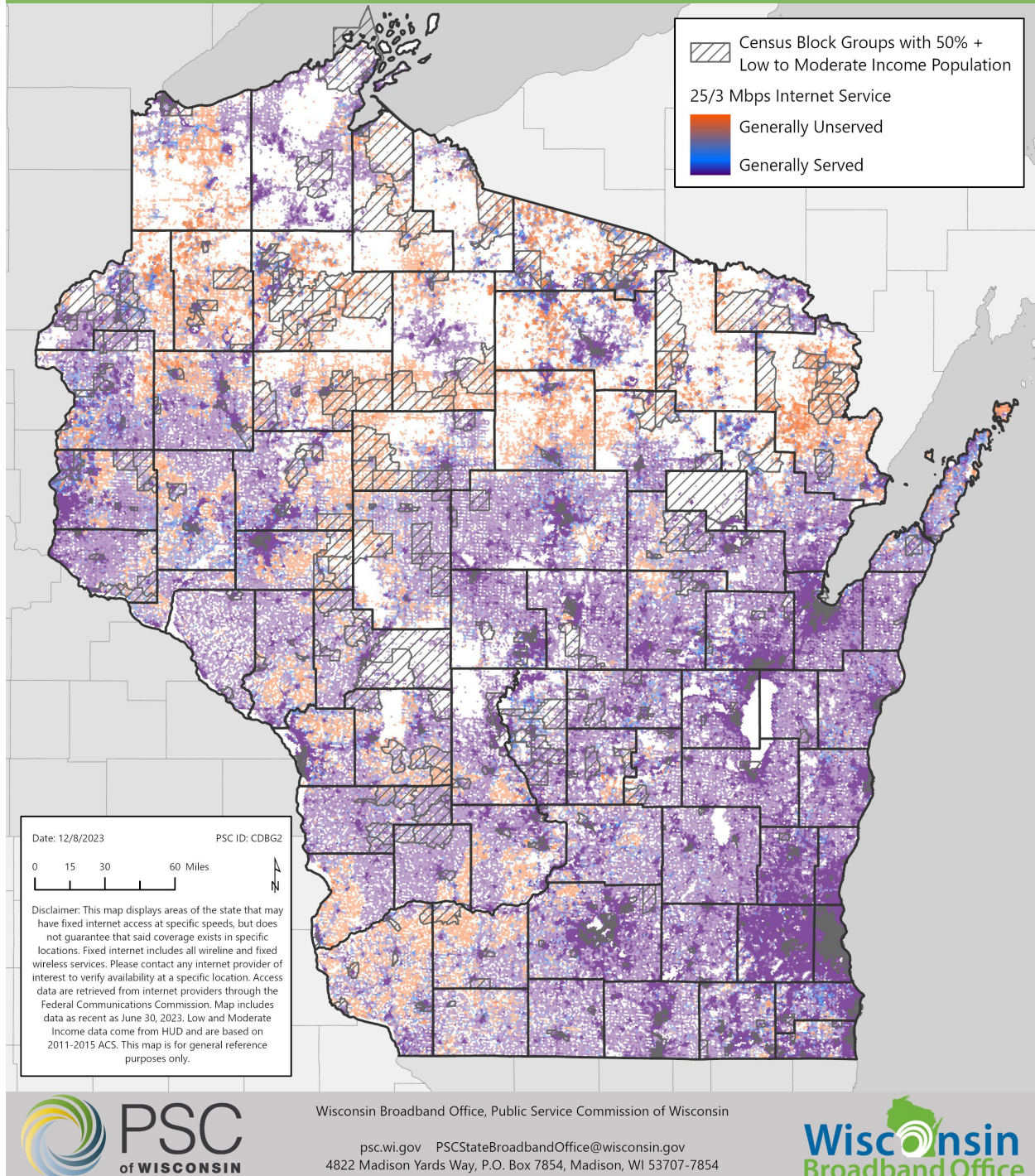
Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The Wisconsin Public Service Corporation (WIPSC), Broadband Office performed geospatial analysis to identify areas that lacked certain levels of broadband coverage that also intersected with LMI census block groups. The WIPSC overlaid Community Development Block Grant (CDBG) Low to Moderate Income Population Block Groups overlaying fixed internet coverage data. Broadband internet access data are retrieved from internet providers and the Federal Communications Commission's Form 477.

The WIPSC administers the Broadband Internet Expansion Grant Program. For the 2021 grant round, \$24 million has been made available to applicants to help expand broadband internet to unserved areas of the state.

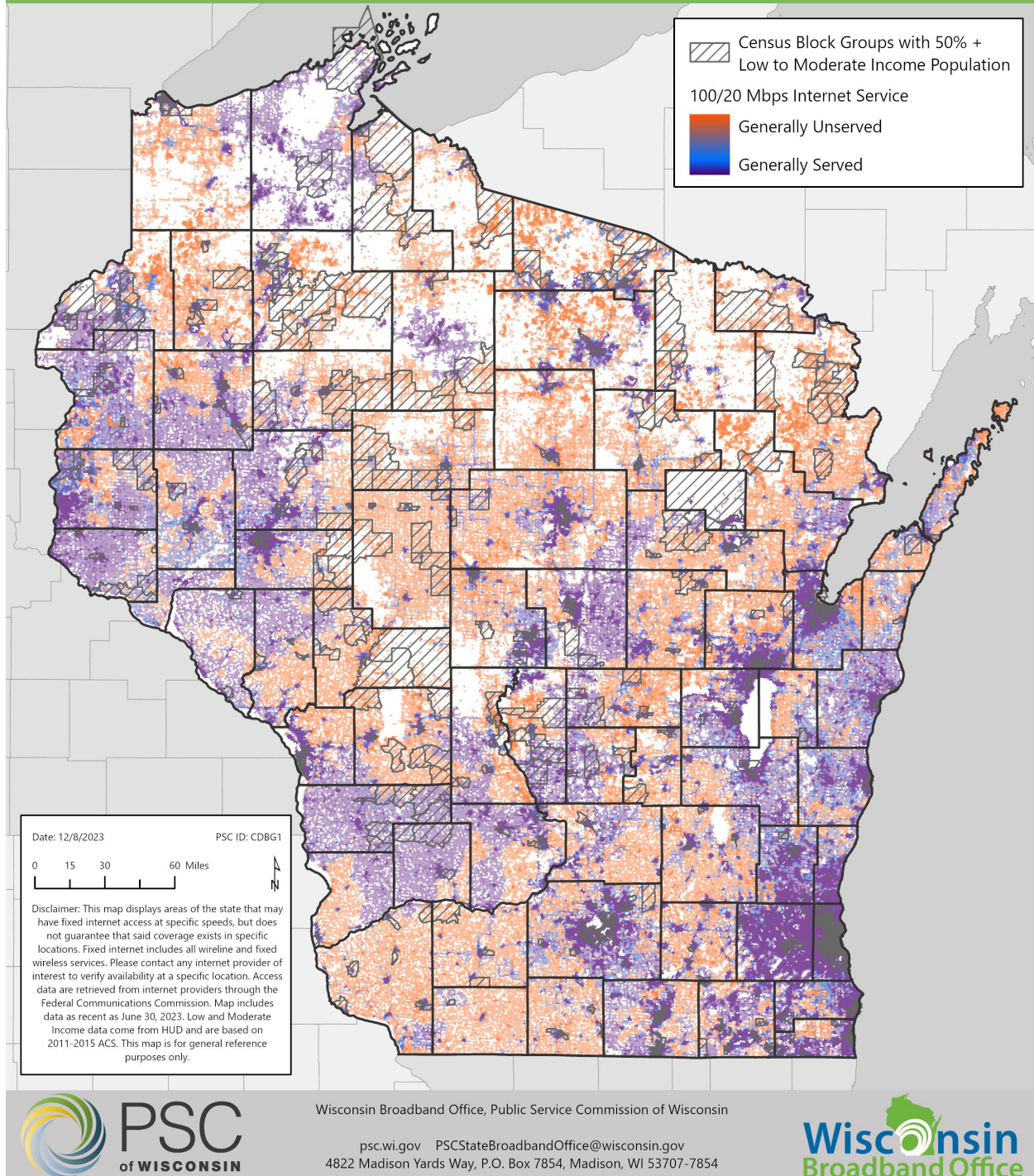
COVERAGE STATUS FOR 25/3 SERVICE WITH CDBG-BASED LOW-MODERATE INCOME AREAS

Presented by the Wisconsin Broadband Office



COVERAGE STATUS FOR 100/20 SERVICE WITH CDBG-BASED LOW-MODERATE INCOME AREAS

Presented by the Wisconsin Broadband Office



MA-65 Hazard Mitigation – 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Wisconsin Emergency Management (WEM) is the lead agency for the hazard mitigation program in Wisconsin, a key component of which is the State of Wisconsin Hazard Mitigation Plan. The current State Hazard Mitigation Plan was published in December 2021. The current plan builds upon the Risk Assessment and Mitigation Strategy originally developed in 2001 and updated in 2005, 2008, 2011 and 2016. In accordance with FEMA requirements, the next update of the State Hazard Mitigation Plan is scheduled for 2026.

According to the State of Wisconsin Hazard Mitigation Plan,³ the risks associated with climate change are the top concern statewide, followed by severe weather (including tornadoes and high winds, hail and lightning), flooding, wildfire, drought and extreme heat as well as winter storms and extreme cold. These types of hazards were found to be the greatest risk through analysis of historical data, past occurrences, and the result of the vulnerability and loss assessment, as well as integrating the results from the Wisconsin Critical Facilities Risk Assessment.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Section 3 of the Hazard Mitigation Plan outlines the policies, programs, capabilities and strategies of WI:

The Pre-Disaster Mitigation Competitive (PDM-C) program provides mitigation grants to WI, local governments, and tribes for comprehensive hazard mitigation planning and to implement cost-effective mitigation projects.

The Building Resilient Infrastructure and Communities (BRIC) Program was created to replace the PDM program. Rather than relying on Congress to allocate funding every budget cycle to fund the PDM program, BRIC uses a 6% allocation of all expenditures in the previous year in the Disaster Relief Fund (DRF). Eligible subrecipients in states and Tribal Nations that received a Major Disaster Declaration in the previous 7 years are eligible to apply for funding in the State Set-aside allocation, Tribal Set-aside allocation, and national competition each year.

The Hazard Mitigation Grant Program (HMGP) provides mitigation grants to WI local governments, eligible private non-profit organizations, and tribes for comprehensive all-hazards mitigation planning and to implement cost-effective mitigation projects.

³ https://wem.wi.gov/wp-content/library/Mitigation/Appendix_A_THIRA.pdf

Increased Cost of Compliance (ICC) coverage pays insurance claims for compliance with WI or community floodplain management laws or ordinances after a direct physical loss by flood. If a building in the floodplain covered by a Standard Flood Insurance Policy sustains a flood loss and WI or community declares the building to be substantially or repetitively damaged, ICC will pay up to \$30,000 for the cost of elevation, floodproofing, demolition, or relocation that will bring the structure into compliance with WI or local floodplain ordinance.

The Flood Mitigation Assistance (FMA) provides funding to develop comprehensive flood mitigation plans and implement cost-effective mitigation measures on NFIP-insured properties. The former Repetitive Flood Claims and Severe Repetitive Loss programs have been rolled into the FMA program. Mitigation of repetitive loss and severe repetitive loss properties as defined by FEMA is the highest priority for the program.

NR 116 Local and State Floodplain Standards prohibit construction in floodways and requires elevation and dry-land access in flood fringe areas. It limits improvements to non-conforming structures and requires compensatory storage in flood storage areas.

Comprehensive planning legislation requires local governments to have comprehensive plans to guide in making land-use decisions. It complements mitigation planning and has adds the mitigation planning movement by requiring the incorporation mitigation elements into comprehensive plans by 2010.

The Home Safety Act requires the state's Uniform Dwelling Code (UDC) be enforced throughout WI. All new construction must be inspected for compliance with the UDC. The law improves the disaster resistance of homes by requiring implementation of safety standards at the time of construction. The effect will be a reduction in injury and property loss from all types of natural hazards.

The Municipal Flood Control and Riparian Restoration Program provides grants for the mitigation of flood-prone property, the restoration of riparian areas, and the construction of flood control projects.

The Firewise Communities program is a resource for agencies, tribes, organizations, fire departments, and communities across the US who are working toward a common goal: reduce loss of life, property, and resources to wildland fire by building and maintaining communities in a way that is compatible with our natural surroundings. It is part of the National Wildland/Urban Interface Fire Program.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Division of Energy, Housing and Community Resources offers a broad range of financial and technical assistance to improve and expand housing, increase affordable housing opportunities, and provide services to people without housing or facing the loss of housing. The variety of federal and state programs it manages benefit low- and moderate-income residents and homeless populations. The Division partners with local units of government, homeless service providers, housing developers, and a variety of not-for-profit organizations throughout the state to improve housing conditions for low- to moderate-income Wisconsin residents. The Division distributes over \$45 million annually.

It is the Division of Energy, Housing and Community Resources' mission to assist Wisconsin governments, businesses, and non-profit agencies to build and sustain quality communities and create economic opportunities by facilitating locally driven solutions to develop and improve community facilities, address affordable housing and homeless needs, and foster economic growth and job creation and retention.

The Division of Energy, Housing and Community Resources has identified five high priority needs for the State of Wisconsin:

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

The Division of Energy, Housing and Community Resources has identified 12 goals for the State of Wisconsin:

- Rehabilitate Owner Occupied Housing
- Rehabilitate Rental Housing
- Build New Rental Housing
- Provide Down Payment Assistance for Homebuyers
- Provide Tenant-Based Rental Assistance for Low-Income Households

- Provide Assistance to Those Experiencing Homelessness or at Risk of Homelessness
- Assist Communities with Public Facilities Projects
- Create and Retain Jobs through Economic Development Assistance and Job Training
- Increase Housing Options for Persons Living with HIV/AIDS
- Provide Emergency Assistance Funding to Communities
- Assist Communities with Local Planning
- Special Projects

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 50 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

CDBG: The Division of Energy, Housing and Community Resources 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 that will have a positive impact on low- and moderate-income persons receiving priority. The CDBG Housing program distributes funds to seven housing regions, and then the regional administrator of each housing region distributes dollars around the region. UGLG's remain eligible to apply for CDBG-Housing funds.

HOME: The Division of Energy, Housing and Community Resources 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, the Division of Energy, Housing and Community Resources, 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: The Division of Energy, Housing and Community Resources ensures, currently through its contract with Vivent Health (formerly known as Aids Resource Center of Wisconsin (ARCW)), full coverage in the 68 counties in DEHCR's HOPWA area.

HTF: The Division of Energy, Housing and Community Resources will ensure statewide eligibility for funding and that funds are awarded on a competitive basis based on a unifying set of criteria.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Persons with Physical Disabilities
	Geographic Areas Affected	
	Associated Goals	Build New Rental Housing Provide Down Payment Assistance to Homebuyers Provide Tenant-Based Rental Assistance Rehabilitate Owner Occupied Housing Convert Vacant or Abandoned Commercial Structures to Affordable Housing Rehabilitate Rental Housing Special Projects
	Description	The Division of Energy, Housing and Community Resources (DEHCR) funds affordable housing programs through CDBG Housing and HOME funding. These programs fund the construction, conversion and rehabilitation of affordable housing and provide rental and down payment assistance to lower income households. In addition, DEHCR will make HTF awards to eligible recipients to construct and rehabilitate housing for extremely low-income families.
	Basis for Relative Priority	Needs Assessment and Market Analysis data, public survey results, and public input have all revealed a persistent need for housing affordable to lower income households and extremely low-income households.
2	Priority Need Name	Reducing Homelessness

	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Provide Homeless Assistance Provide Tenant-Based Rental Assistance Special Projects
	Description	The Division of Energy, Housing and Community Resources funds homeless assistance programs through its ESG program. This program provides funding for emergency shelter, street outreach, prevention, and rapid re-housing.
	Basis for Relative Priority	Data included in the Needs Assessment and Market analysis has shown that homelessness in WI continues to be a significant issue. To address the issue, DEHCR will continue to invest in evidence-based practices to best prevent and end homelessness.
3	Priority Need Name	Special Needs Assistance
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Increase Housing Options for Persons with HIV/AIDS Provide Tenant-Based Rental Assistance Special Projects
	Description	The Division of Energy, Housing and Community Resources funds special needs programs through its ESG and HOPWA programs. ESG assists special needs populations who are experiencing homelessness, and HOPWA assists persons with HIV/AIDS.
	Basis for Relative Priority	Data included in the Needs Assessment and Market analysis show a large population of elders, frail elders, persons with disabilities, persons with substance abuse disorders, and persons with HIV/AIDS. While not all persons with special needs need housing assistance, persons with special needs experience higher rates of housing problems.
4	Priority Need Name	Non-housing Community Development
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Non-housing Community Development

	Geographic Areas Affected	
	Associated Goals	Assist Communities with Local Planning Assist Communities with Public Facilities Projects Special Projects Assist Communities with Emergency Assistance Prevent, prepare for, and respond to coronavirus
	Description	The Division of Energy, Housing and Community Resources funds community development programs through its CDBG funding. These programs address community development needs such as the need for public facilities and planning grants.
	Basis for Relative Priority	Stakeholder and public survey feedback indicated a need for community development projects, especially in areas with aging public infrastructure.
5	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Create Jobs Through ED Assistance and Job Training Special Projects
	Description	The Division of Energy, Housing and Community Resources funds economic development programs through CDBG funding. CDBG programs address economic development needs through economic development loans and job training.
	Basis for Relative Priority	Data presented in the Market Analysis, and stakeholder and public input have revealed a need for investment in economic development and job training in communities across the state.

Narrative (Optional)

The geographic scope of the Division of Energy, Housing and Community Resources planning authority is limited to CDBG non-entitlement areas and all CDBG awards are targeted to meet a CDBG National Objective in accordance with HUD program regulations. In addition, DEHCR will make HTF awards to eligible recipients to construct and rehabilitate housing for extremely low-income families.

SP-30 Influence of Market Conditions – 91.315(b)

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA):	The Division of Energy, Housing and Community Resources will use TBRA funds in markets where there are rental housing choices for lower income renters and persons experiencing homelessness, but where they are experiencing or would experience a housing cost burden and need temporary assistance with monthly payments.
TBRA for Non-Homeless Special Needs:	The Division of Energy, Housing and Community Resources will use TBRA funds in markets where there are rental housing choices for lower income special needs renters and persons experiencing homelessness, but where they are experiencing or would experience a housing cost burden and need temporary assistance with monthly payments.
New Unit Production	New units of rental housing will be constructed in markets with a significant number of low-income renter households and an insufficient stock of affordable housing units. New owner-occupied units may be produced if there is a market and need for the units. In addition, the Division of Energy, Housing and Community Resources will make awards to eligible recipients to construct housing for extremely low-income families.
Rehabilitation	Rehabilitation will be used in markets where there are significant numbers of low-income households requiring rental or owner-occupied housing and an adequate stock of housing units which could be rehabilitated into decent, safe, and sanitary housing. In addition, the Division of Energy, Housing and Community Resources will make awards to eligible recipients to rehabilitate housing for extremely low-income families.
Acquisition, including preservation	The Division of Energy, Housing and Community Resources will provide acquisition funds to grantees when demand demographics show that the project will be financially feasible.

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

Anticipated Resources

Table 52 - Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	27,485,501	20,359,612	12,006,513	59,851,626	109,942,004	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	10,537,811	9,787,972	17,774,303	38,100,086	42,151,245	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,127,169	0	0	1,127,169	4,508,676	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,571,427	0	0	3,571,427	14,285,708	
Housing Trust Fund	public - federal	Admin and Planning Multifamily rental new construction Multifamily rental rehab	3,295,885	995,332	6,723,736	11,014,953	13,183,542	DEHCR will make awards to eligible to construct and rehabilitate housing for extremely low-income families utilizing these funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Economic Development Homeowner rehab Housing Multifamily rental new construction New construction for ownership Public Improvements Short term or transitional housing facilities	0	0	0	0	0	
Other	public - federal	Acquisition Admin and Planning Economic Development Multifamily rental rehab Other	0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-DR	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Homeowner rehab Multifamily rental rehab	0	0	\$15,355,000	\$15,355,000	\$0	
Other	FY2020 ESG-CV	Prevent, prepare for, and respond to coronavirus	0	0	0	0	\$0	
Other	FY2020 CDBG-CV	Prevent, prepare for, and respond to coronavirus	0	0	\$44,006,396	\$44,006,396	\$0	
Other	FY2020 HOPWA-CV	Prevent, prepare for, and respond to coronavirus	0	0	0	0	\$0	

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

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

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

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

HOPWA formula grants do not have matching requirements.

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

Not applicable.

Discussion

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

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Wisconsin Department of Administration- Division of Energy, Housing and Community Resources	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	State
Wisconsin Housing and Economic Development Authority	Quasi-governmental	Economic Development Housing Ownership Housing Rental Public Housing	State

Table 53 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System

The Division of Energy, Housing and Community Resources develops housing policy and offers a broad range of program assistance and funds to address people experiencing homelessness and support affordable housing, public infrastructure, and economic development opportunities. The Division partners with local governments and service providers, non-profit agencies, housing authorities, and developers. The Division is the lead agency responsible for the creation and implementation of this Consolidated Plan. The Division is comprised of the following four bureaus:

- The Bureau of Community Development is responsible for public infrastructure, blight elimination, and business development activities.

- The Bureau of Housing oversees homeless and special needs programs, home purchase and rehabilitation, single family and multifamily development, and disaster recovery assistance.
- The Home Energy Plus Bureau administers the Wisconsin Home Energy Assistance Program, the State Weatherization Program, the State Furnace Program and the Public Benefits Program.
- The Program Services Bureau provides information technology support and development as well as all fiscal services for the Division.

The Division of Energy, Housing and Community Resources works directly with units of local government (UGLGs) and economic development agencies and organizations; and housing program staff work with community housing development organizations (CHDOs), nonprofit agencies, and tribal authorities. In addition, DEHCR encourages activities with private sector partners. The Division will continue to support and train local housing and homeless service agencies, encourage local and regional consortia of housing and service providers, and work with intermediaries to provide technical assistance to grantee agencies.

The Division has developed a regional delivery system to distribute the portion of Wisconsin's Community Development Block Grant (CDBG) funds dedicated to housing. This network provides funds to "Small City" jurisdictions that do not receive direct CDBG funding from HUD ("the entitlement communities"). Through this network, many administrative duties are carried out by regional administrative agencies, thus allowing local agencies to focus on priority housing rehabilitation and conversion projects that meet local needs.

The Division of Energy, Housing and Community Resources works with an established network of CHDOs in the State of Wisconsin. It has previously certified 23 organizations as part of the institutional delivery structure for developing and operating affordable housing in Wisconsin.

Recent changes to HOME program rules have opened some gaps in CHDO institutional delivery structure. It is now much more difficult for CHDOs to enter into partnerships with private developers on LIHTC projects. These formerly strong partnerships were key for statewide affordable housing stakeholders in building additional multi-family units for a needy population.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X		
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 54 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Services targeted to people experiencing homelessness are delivered by homeless service agencies throughout the state. Many of these agencies participate in their respective Continuum of Care, which governs service provision and standards. DEHCR encourages homeless service providers to participate in their Continuum of Care and coordinate efforts to prevent and end homelessness at the regional level.

The Homeless Case Management Services (HCMS) grant program was created through the Temporary Assistance for Needy Families (TANF) block grant program and through Wisconsin Act 59 (statute §16.3085). As such, all funding provided via the grant is subject to TANF rules and regulations. Eligible families are defined by TANF regulation as one of the following:

1. Homeless adults (age 18 or older) accompanied by minor children (under age 18 for whom the homeless adults are legally responsible, or under 19 but a full-time student in high school, working on an equivalency degree, or enrolled in basic vocational or technical education)
2. Homeless pregnant women
3. Homeless adults, unaccompanied by children, who are non-custodial parents of children under the age of 18
4. Homeless adults, unaccompanied by children, who are over age 18 but younger than age 25 and accompanied by another person related by blood or marriage

Please note, families headed by a person under 18 cannot be served. Priority is given to servicing the first two types of families, however all families as defined above can be served.

Families entered into the HCMS grant program must be provided intensive case management services focusing on at least one of the following areas:

1. Financial management
2. Employment
3. Ensuring school continuation for children
4. Enrolling unemployed or underemployed parents in W-2 or the Food Share employment and training program

In addition, the ESG program requires recipients to assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), mainstream services, and other federal, state, local, and private assistance available for such individuals.

DEHCR's HOPWA grant funds services and housing support for persons with HIV/AIDS in the 68 county HOPWA service areas. Other areas of Wisconsin are served by the Milwaukee and Minneapolis HOPWA allocations.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

A strength in the service delivery system is the State Interagency Council on Homelessness, which meets quarterly to discuss homelessness as it relates to multiple programs housed across state agencies. Another is the collaborative relationship between DEHCR and the four Continua of Care. The governance systems of the Continua of Care have continued to grow stronger, allowing them to address service gaps and reduce duplication of services.

A weakness in the institutional delivery structure is the difficulty in meeting the needs of those experiencing homelessness across the state. Rural communities often lack supportive services and permanent supportive housing, making it difficult to house chronically homeless individuals and households. Urban communities often have a greater diversity of service types than rural areas; however, must turn households away due to the lack the funds available to serve all of those in need.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Division of Energy, Housing and Community Resources will continue to work with the Continua of Care and other stakeholders to address gaps in the institutional delivery structure. The continued implementation of coordinated assessment at the Continua of Care level will help those experiencing homelessness to access multiple facets of the institutional delivery structure. ESG grantees will continue to be required to work within their CoC and participate in coordinated assessment. Whenever possible, the Division of Energy, Housing and Community Resources will encourage or require evidence-based practices in its programs in order to ensure that funds are spent efficiently.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitate Owner Occupied Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$36,665,658 HOME: \$4,979,116	Homeowner Housing Rehabilitated: 1,255 Household Housing Unit
2	Rehabilitate Rental Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$398,540 HOME: \$3,951,679 Housing Trust Fund: \$3,295,885	Rental units rehabilitated: 171 Household Housing Unit
3	Build New Rental Housing	2025	2029	Affordable Housing		Affordable Housing	HOME: \$7,903,358 Housing Trust Fund: \$13,183,542	Rental units constructed: 115 Household Housing Unit
4	Convert Commercial or Public Buildings to Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG:	Rental units converted: 1 Household Housing Units
5	Provide Down Payment Assistance to Homebuyers	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$2,789,778 HOME: \$6,875,922	Direct Financial Assistance to Homebuyers: 397 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Tenant-Based Rental Assistance	2025	2029	Affordable Housing		Affordable Housing Homelessness Special Needs Assistance	HOME: \$23,710,075	Tenant-based rental assistance / Rapid Rehousing: 4,167 Households Assisted
7	Provide Homeless Assistance	2025	2029	Homeless		Homelessness	ESG: \$14,857,135	Tenant-based rental assistance / Rapid Rehousing: 8,190 Households Assisted Homeless Person Overnight Shelter: 70,000 Persons Assisted Homelessness Prevention: 20,000 Persons Assisted Other: 5,000 Other
8	Assist Communities with Public Facilities Projects	2025	2029	Non-Housing Community Development		Community Development	CDBG: \$70,088,028	Public Facility or Infrastructure Activities other than Low/Moderate-income Housing Benefit: 210,264 Persons Assisted
9	Create Jobs Through ED Assistance and Job Training	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$6,871,375	Jobs created/retained: 196 Jobs

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Increase Housing Options for Persons with HIV/AIDS	2025	2029	Non-Homeless Special Needs		Special Needs Assistance	HOPWA: \$5,635,845	Tenant-based rental assistance / Rapid Rehousing: 733 Households Assisted
11	Assist Communities with Emergency Assistance	2025	2029	Affordable Housing Community Development		Affordable Housing Community Development	CDBG: \$10,994,200 CDBG-DR: \$15,355,000	Public Facility or Infrastructure Activities and Low/Moderate-income Housing Benefit: 265 Persons Assisted
12	Assist Communities with Local Planning	2025	2029	Non-Housing Community Development		Community Development	CDBG: \$1,374,275	Other: 55 Other
13	Special Projects	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Affordable Housing Community Development Economic Development Homelessness Special Needs Assistance	CDBG: \$4,122,825	Other: 5 Other
14	Prevent, prepare for, and respond to coronavirus	2025	2029	Prevent, prepare for, and respond to coronavirus		Prevent, prepare for, and respond to coronavirus	CDBG-CV: \$44,006,396	Other: 1 Other

Table 55 – Goals Summary

Goal Descriptions

Consolidated Plan

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

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

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

It is difficult to determine the number of extremely low-income, low-income and moderate-income families who will be served with HOME funds; however, based on the goals listed above there will be 115 households assisted with new housing opportunities, 1,426 households assisted with rehabilitation, 397 households provided with down payment assistance and 4,167 households assisted with tenant based rental assistance.

In addition, DEHCR will make Housing Trust Fund awards to eligible recipients to rehabilitate and construct new rental housing for extremely low-income families. DEHCR projects that HTF funds will rehabilitate approximately 13 rental units per year equaling a total of 66 for the duration of the Plan at current funding levels. DEHCR projects that HTF funds will construct approximately 11 new rental units per year equaling a total of 56 for the duration of the Plan at current funding levels.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not Applicable.

Activities to Increase Resident Involvements

Not Applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

Not Applicable.

Plan to remove the ‘troubled’ designation

The Division of Energy, Housing and Community Resources has no administrative authority over Public Housing Authorities. DEHCR staff will continue to serve as resource advisors to the Wisconsin Association of Housing Authority board of directors and be available to provide assistance to “troubled” PHAs where feasible. DEHCR staff regularly attend WI Association of Housing Authority meetings and conferences to announce funding opportunities and provide information applicable to public and assisted housing.

Through its HCRI/HOME homebuyer program, the Division of Energy, Housing and Community Resources will continue to offer funds which can be used by grantees to provide down payment and closing cost assistance to public housing or other assisted housing residents seeking to become homeowners provided that they meet the income qualifications. Through the HOME TBRA and Homelessness Prevention Programs, the Division will continue to provide short to medium term rental assistance as well as security deposits and first/last month rent to support individuals and families that may soon be housing authority tenants or housing choice voucher participants. The Division will look to strengthen partnerships with PHA’s in order to serve a greater population during the planning period.

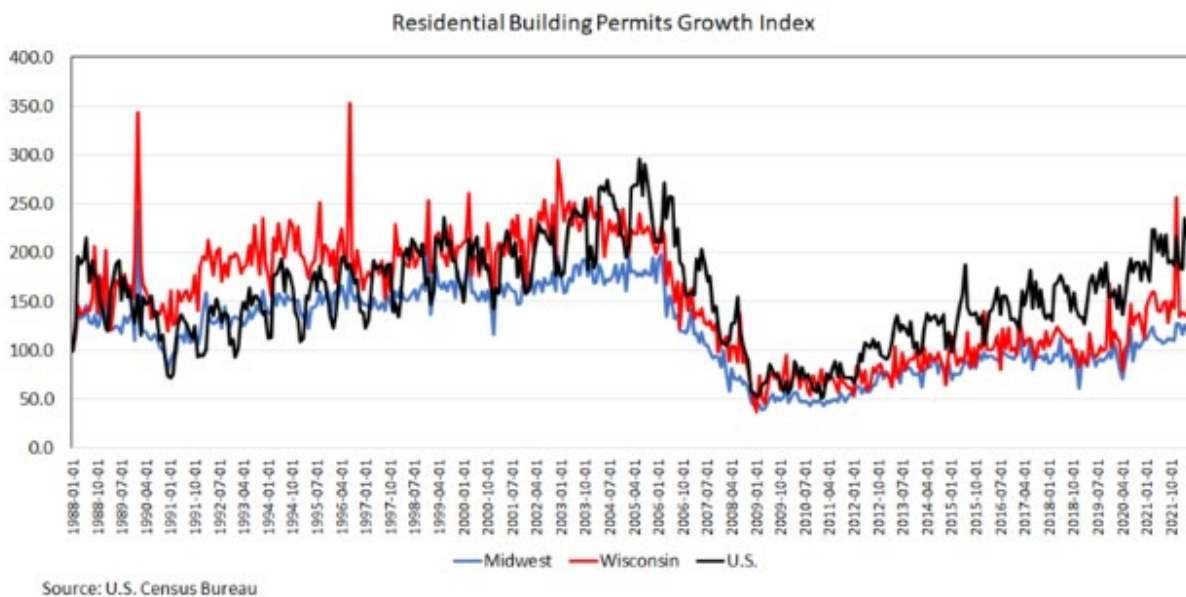
SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Wisconsin, like its peer states in the Midwest, is facing a shortfall of affordable housing, particularly for households earning less than 30% of the county median income. In addition, workforce housing, the supply of housing in a community (variety of types, sizes, locations, prices) that meets the need of the workforce in a community, is an issue across the state. In Wisconsin, this means housing that is affordable to the workforce: for renters, up to 60 % of area median income (AMI) and for owners, up to 120 % of area median income (AMI).

In Wisconsin, cities, communities, and villages need a wider range of housing options. Fewer than 20% of all households nationwide are families with children, and nearly 50% of all households are made up of one or two people. Much of the existing housing stock consists of large, single-family homes which may not be affordable—or practical—for the makeup of modern households.

According to the Wisconsin Realtors Association, Falling Behind Report (2019), Wisconsin has not built enough homes over the past 10 years to keep up with population and income growth.

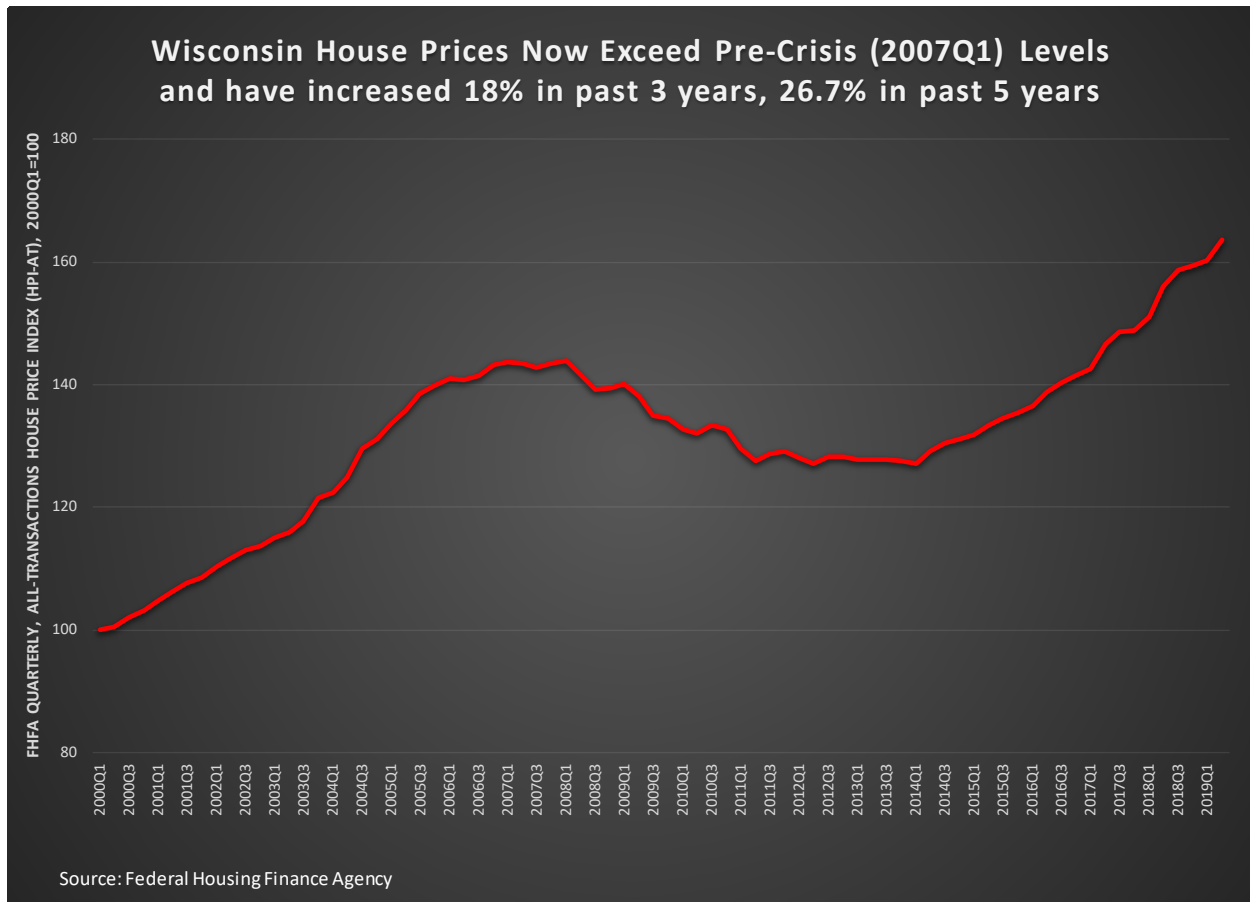


In addition, purchase prices in Wisconsin are rising faster than inflation and incomes. From 2018-2022, purchase statistical index (RS Means index) increased:

- 105.29 percent in WI non-Metropolitan Statistical Areas
- 82.92 percent in Milwaukee-Waukesha MSA
- 97.75 percent in Green Bay MSA

- 91.6 percent in Madison MSA
- 76 percent of Wisconsin construction firms reported labor shortages (Assoc. of Gen. Contractor survey)

As a result, housing costs are rising (both ownership and rental) and rents have grown faster than incomes (October, 2022 data).



In the 2024 Housing and Community Development Survey, respondents were then asked if they knew of any barriers to the development or preservation of housing in their communities. Respondents most commonly identified community opposition, or “not in my backyard” mentality, as a barrier to the development or preservation of housing. Cost was also a commonly perceived impediment as building materials, fuel, and services continue to become more expensive in the market, with the costs of land, materials, or labor ranking as the highest barriers to the development or preservation of housing. Those who provided additional narrative commentary in response to this question tended to highlight these same concerns, with many calling for outreach and education to address NIMBYism and a range of strategies designed to decrease the costs of providing affordable housing, including redevelopment, updates to zoning codes, and additional funding.

Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing varies widely throughout the State and is typically affected by local policies over which the state has little control. Wisconsin's tradition of home rule, embodied in the State Constitution, means that 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.

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. For example, a number of communities in Wisconsin, particularly in suburban areas around larger cities, impose impact fees on new residential development in the effort to cover broad-based costs for improvements and public facilities that can (potentially) slow down a boom in new housing starts. The State Legislature, in 1994, passed an act to develop more regularity in impact fees across its communities, with an allowance made for communities to waive impact fees for low-income housing. Other steps have been taken as well in fast-growth areas, such as increasing lot sizes and setbacks and establishing minimum square foot requirements for new residences. The state's home rule provisions mean that zoning ordinances are left to the judgment of local governments. The net effect of these local actions could make housing more expensive than might be the case without the new fees and regulations.

An extended analysis of the impact of state laws and regulations upon affordable and fair housing in Wisconsin can be found in DEHCR's Analysis of Impediments to Fair Housing Choice. Topics covered that may include analysis of the effects of public policies on affordable housing include:

- Local Land-Use Regulations
- Blighted area, urban redevelopment, and urban renewal laws
- Local housing authority laws
- Comprehensive planning laws
- Tax incremental financing laws
- Zoning laws
- Impact Fees
- WHEDA statewide tax deferral and abatement programs, Property tax deferral program, Homestead credit, Supplement to the federal historic rehabilitation credit.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The State of Wisconsin's "home rule" provisions mean that zoning ordinances are left to the judgment of local governments. Sometimes local governments, in an attempt to cover the broad-based costs of public facilities improvements or to slow down a boom in new housing starts, will choose to impose

impact fees, increasing lot sizes and setbacks, or establishing minimum square foot requirements for new residences. State statutes do allow local governments to waive impact fees for affordable housing developments, but it is not known how often these fees are 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.

The Division of Energy, Housing and Community Resources 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. Wisconsin's communities are encouraged to enact reforms to increase housing availability, encourage aging in place and provide better housing options that may respond to market demands.

Containing the cost of developing affordable housing is a critical issue in Wisconsin. In order to address the growing need for affordable housing, DEHCR strives to build and preserve as many affordable units as possible with limited resources, prioritizing those at lowest incomes. The costs of land, materials, labor and rapidly increasing interest rates are market dependent. However, per unit costs are evaluated for each project and overall costs of housing unit production are monitored and evaluated in applications for funding. DEHCR tries to incentivize projects with lower total development costs. At the same time, DEHCR prioritizes other policy goals, such as long-term operating costs, serving underserved regions of the state and targeting those at lowest incomes.

The Division of Energy, Housing and Community Resources and other state agencies do work to ameliorate barriers to affordable housing in several ways, including:

- Support for the WIHousingSearch.org website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.
- The Division of Energy, Housing and Community Resources works to improve the stock of affordable housing in non-entitlement jurisdictions through its state- and federally funded housing programs especially those that are located in areas with a need for more affordable housing opportunities.
- In addition, the State fully supports efforts to reduce NIMBYism, prejudice, and negative attitudes toward affordable and multifamily housing, and will encourage planning decisions by CDBG subrecipient communities that work to decrease segregation and increase integration of populations.
- The Wisconsin Housing and Economic Development Authority's (WHEDA) Low-Income Housing Tax Credit (LIHTC) program offers a reduction in tax liability to property owners and private investors to encourage the development of affordable rental housing. In addition, WHEDA administers the federal Housing Trust Fund which provides funding to construct housing for Extremely Low-income renters.

SP-60 Homelessness Strategy – 91.315(d)

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

Coordinated entry has the potential to create more efficient homeless service systems by targeting resources toward those who need them most and helping clients move through the system faster. In Wisconsin, coordinated entry has been implemented at the CoC level. The Division of Energy, Housing and Community Resources will continue to require agency participation in coordinated entry for their CoC as a part of the ESG program. Agencies must maximize available resources and have the ability to serve the next person on the list should the household most in need decline services.

The Division of Energy, Housing and Community Resources recognizes that street outreach to those experiencing homelessness is necessary in order to engage them and work towards housing stability. The Division of Energy, Housing and Community Resources will encourage 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 and transitional housing needs of homeless persons

Emergency shelter is a critical part of the homeless service system. Shelters provide temporary refuge and often serve as the “front door” or first place of entry to those experiencing homelessness. As such, it is important that emergency shelters have the ability to connect those experiencing homelessness with the resources needed to exit homelessness. The Division of Energy, Housing and Community Resources measured the performance of emergency shelters using a variety of metrics, including clients served, average length of stay, returns to homelessness, and occupancy rate. The Division of Energy, Housing and Community Resources will continue its effort to measure performance and direct more funding towards best performing programs. Transitional housing projects are not funded by the ESG program, but DEHCR allows the use of state funding for transitional housing in cases where it has been demonstrated to be efficient and effective.

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

The ESG program allows for funding of rapid re-housing programs. Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing. This approach has proven to decrease the length of time participants spend homeless, taking strain off of the shelter system and decreasing total resources needed to provide housing. Case management and other voluntary services

provided along with rental subsidy aim to stabilize families so that they can maintain rent payments after rental assistance ends. Case management is key to a successful transition to independent living.

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

The HOME TBRA program targets low-income households. This program provides up to 24 months of rental assistance, to help households obtain and maintain housing stability. DEHCR has greatly expanded its funding of TBRA in recent years.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Through its involvement with the Interagency Council on Homelessness, the Division of Energy, Housing and Community Resources works with the four Wisconsin CoCs and other state agencies which administer publicly funded programs that may discharge persons into housing instability or homelessness. Collaboration between agencies fosters coordination to work towards discharge planning solutions. Recently, the Division of Energy, Housing and Community Resources collaborated with the 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 are at risk of homelessness. In addition, DEHCR works with the Department of Children and Families to administer a Temporary Assistance to Needy Families (TANF) funded program to provide additional case management funding to homeless shelters to better enable the transition to independent living.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Several programs across the state have funds available to reduce lead-based paint hazard exposure in affordable housing. Owner-occupied affordable housing units must be occupied by families at or below 80% of the county median income. Vacant units must be marketed to families. Children under age six living in the unit must have a blood test within six months prior to construction activities in order for the family to receive assistance. Priority will be given to households occupied by children that have high levels of lead in their blood. Hazard reduction activities will be determined by certified risk assessors, and certified contractors must perform the work. Units assisted must pass federal clearance levels at project completion.

Under state law, the Department of Health Services (DHS) implements a comprehensive statewide lead poisoning prevention program and all blood lead tests are reported to DHS. DHS then distributes these blood lead test results so that local health departments can provide follow up services to families of lead exposed children and work to prevent future exposures. DHS distributes state funding and provides guidance to local health departments to support this work. DHS matches data with Medicaid and helps assure that Medicaid children are tested as required. As resources permit, DHS provides data to encourage health care providers to test high risk children under their care. DHS provides data, editing and technical support for local agencies in their applications for HUD funding to address lead paint hazards. DHS has implemented grants from HUD to address lead paint hazards in housing and has partnered with DEHCR on the most recent HUD grant by providing technical assistance, e.g., oversight and review of the risk assessments conducted to evaluate lead hazards and to develop work plans appropriate to address the hazards.

How are the actions listed above integrated into housing policies and procedures?

All Division Programs: DEHCR programs document all chipping, peeling, flaking, and/or chalking paint in the housing quality standards inspection as a hazard. Rehabilitation conducted in pre-1978 homes use lead-safe work practices, unless the paint is inspected and tested negative. Contractors must be trained as a lead-safe renovator and provide verification to the grant administrator. After completion, a lead clearance is conducted by a certified professional to ensure the property is safe.

CDBG Housing: CDBG Housing documents all chipping, peeling, flaking, chalking paint in the housing quality standards inspection as a hazard. All rehabilitation conducted in pre-1978 homes use lead-safe work practices, unless the paint is inspected and tested negative. Contractors must be trained as a lead-safe renovator and provide verification to the grant administrator. After completion, a lead clearance is conducted by a certified professional to ensure the property is safe.

EAP: The Emergency Assistance Program directs funds specifically to housing rehabilitation needs created by a disaster. The program does not inspect the entire residence; however, should the “spot rehabilitation” activities involve lead remediation, the contractor must be a lead-safe renovator.

HOME HHR: The HOME Homebuyer and Rehabilitation (HHR) program provides funds for homebuyer assistance and owner-occupied or rental rehabilitation. Under HOME HHR owner-occupied rehabilitation, funds are provided for making essential improvements to single-family homes serving as the principal residence of LMI owners. Lead-based paint hazard reduction is one of the eligible costs.

HOME TBRA: The HOME Tenant Based Rental Assistance (TBRA) program requires that a lead-based paint disclosure form be given to all TBRA clients and every unit is inspected for lead-based paint hazards before occupancy. Both procedures are checked during monitoring visits of HOME TBRA-funded programs.

ESG: Any renovation must ensure that the building involved is lead-safe and sanitary. ESG funds given to operate shelters requires that the facility must be free from lead-based paint contamination wherein clients may potentially stay for more than 100 days unless the facility is such that it is statutorily exempted. For homelessness prevention and rapid re-housing, every assisted unit must be free from lead-based paint contamination if the housing is intended to be permanent, or is for first month rent payment and/ or security deposit assistance, or where the residents select their own housing. When lead-based paint requirements do apply, the requirements around notice of evaluation, presumption, hazard reduction activities and the provision of an information pamphlet apply.

HOPWA: While Housing Opportunities for Persons with AIDS (HOPWA) assists eligible persons in their existing housing, the program works with beneficiaries to identify housing options without lead-based paint and other hazards.

HTF: WHEDA is the administrator of the HTF in Wisconsin. WHEDA’s Allocation Plan states that for properties originally constructed before 1978, HTF recipients will be required to complete an inspection for the existence of lead-based paint. If lead-based paint is discovered, the rehabilitation plan must include the removal of the lead-based paint, or a detailed description of how the proposed renovation will comply with the EPA’s Renovation, Repair and Painting Program. All rehabilitation must comply with HUD’s Lead Safe Housing Rule (LSHR).

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The State of Wisconsin remains firmly committed to providing economic growth and opportunity to all of its citizens and views the provision of safe and affordable housing as a critical component of that commitment. The State of Wisconsin considers safe and affordable housing to be a right of all its citizens. Further, it is the responsibility of a healthy vibrant economy to provide affordable housing to its people.

The lack of available, affordable housing in rural areas combined with housing inequality across much of Wisconsin present daunting problems for the state. The demand for affordable housing has grown while the supply of affordable housing has shrunk. The increase in demand largely stems from incomes for working households not keeping pace with rising costs and Wisconsin has not built enough homes over the past 15 years to keep up with population and income growth. While Wisconsin as a state is experiencing low unemployment, wage growth remains slower than predicted. In addition, regular full-time schedules have become rare for low-wage workers, particularly those in the low-skill service economy according to a 2018 report by the Wisconsin Institute for Research on Poverty. There are fewer well-paying jobs available in rural areas than before the recession, especially in manufacturing. At the same time, housing costs have dramatically risen in both single and multi-family.

The lack of affordable housing is a factor that contributes to the persistence of poverty in Wisconsin. Of the 769,400 rental households in Wisconsin, about 10.6% receive federal rental assistance enabling them to rent modest homes at an affordable cost. Of the remaining 687,800 renters, just under one-half are cost burdened, paying over 30% of their income for housing.

Poverty rates vary widely by geographic region, with the highest rates in the northwest and southeast portions of the state. Service agencies in these areas require especially strong support to address the root causes of poverty. As an example of housing problems in the southeast, a recent study by the Southeastern Wisconsin Regional Planning Commission found that households with incomes less than 50 percent of the Region median income will likely require public housing or a housing subsidy to be able to afford decent housing at a cost below 30 percent of their monthly income. There are currently about 46,000 public housing units and housing vouchers in the Region, compared to about 187,000 households with incomes less than 50 percent of the Region's median income. About 24 percent of households in the Region are in this very-low income category.

Very-low income households that are unable to obtain a voucher or a subsidized housing unit often must pay a disproportionate share of their income for housing, which limits their ability to afford food, childcare, health care, and other necessities. The shortage of housing that is affordable to lower-income households also creates a market for dilapidated and sub-standard housing, since poor quality housing is often the only housing option very-low income households can afford.

In rural areas such as northwestern Wisconsin, the housing shortage faced by low-income households in concert with higher transportation costs, consolidation and closure of rural hospitals and recent rises in propane fuel costs make these households even more isolated and vulnerable.

The State of Wisconsin continues to work with policymakers and the larger Wisconsin community to better understand and address the dynamic root causes of poverty and the crucial role of affordable housing in addressing issues of economic self-sufficiency. For example, as low-income households gain stability through secure access to affordable housing, they increase their ability to develop supportive networks and to use other services and programs that provide health care, education, childcare or job training.

For households that are transient or one crisis away from homelessness, the problems of poverty are even more intransigent. For these households, daily survival rather than progress becomes the focus. Therefore, it is important to support and expand successful programs which have been effective in stabilizing housing situations and providing skills development to allow these individuals to eventually obtain better jobs and become more self-sufficient.

The State will also work with policymakers to help them understand how housing needs will change as Wisconsin's population ages. Especially for low-income persons, the predictable changes that come with age such as decreasing mobility, health status and ability to care for oneself will greatly reduce the aging population's ability to keep their homes and to successfully age in place.

As Wisconsin confronts rising construction and home rental costs, coupled with housing inequalities it, like other states, must confront national trends related to weak housing and labor markets. Wisconsin also must acknowledge a handicap in that the state receives less than the national average in federal funds per capita for housing and economic development (2010 US Census). Wisconsin will seek to educate policymakers, including the state's federal congressional delegation, about this issue and to encourage efforts to address this inequality.

The Division of Energy, Housing and Community Resources (DEHCR) analyzes various strategies and operational models to best use federal and state resources in the development of safe and affordable housing in a tight housing economy. The Division will remain committed to providing as much flexibility as possible to local program operators in their efforts to address community needs. The State of Wisconsin recognizes that local and regional anti-poverty agencies are well-situated to understand and respond to the specific, local needs of their individual communities. Therefore, the state will seek to provide funding to help local agencies implement housing initiatives as a critical component of their unique mix of local programs operating to advance economic self-sufficiency.

As part of this effort, the State will, wherever possible, also make flexible funds available throughout the year to program operators to respond to emerging or emergency needs between regular annual grant cycles. Examples of emergencies would include natural disasters, such as flooding, or personal crisis that force vulnerable households into homelessness.

The State of Wisconsin, through DEHCR, will maintain its commitment to providing funding preferences to existing local program operators that have a record of acceptable performance and that integrate their affordable housing and human development programs, either directly or in collaboration, with other anti-poverty programs. To avoid duplication and confusion, the state will, to the maximum extent possible, not fund multiple operators in the same geographic area.

To maximize effectiveness and innovation and to minimize redundancy and paperwork, the State of Wisconsin will also seek to develop or strengthen collaboration with other housing-related providers in Wisconsin, such as the Wisconsin Housing and Economic Development Authority (WHEDA) and the United States Department of Agriculture-Rural Development (USDA-RD). These efforts will address the expanding awareness in housing circles of the interrelationships between affordable housing and energy efficiencies by expanding relationships with the Weatherization Assistance Program or low-income households. In addition, DEHCR will seek to coordinate with the Department of Workforce Development to connect educational and job training programs for low-income and homeless residents. By creatively collaborating with these groups, the State of Wisconsin intends to help local housing assistance providers leverage additional dollars to maximize both the impact of public resources and the quality of the housing being developed.

Wisconsin has developed a system of regional networks to distribute that portion of Wisconsin's Community Development Block Grant (CDBG) funds dedicated to housing. This network provides funds to "Small City" jurisdictions that do not receive direct CDBG funding from HUD ("the entitlement communities"). Through this network, many administrative duties are carried out by regional administrative agencies, thus allowing local agencies to focus on priority housing projects that meet local needs. Wisconsin will maintain these regional housing networks.

The National Association of Home Builders has developed economic models that demonstrate the strong and sustaining ripple effects of local spending on housing rehabilitation. The use of CDBG funds dedicated to housing rehabilitation for low- to moderate-income households will be a valuable tool in continuing to support growth and economic development throughout the state.

The State of Wisconsin is also committed to seeking additional sources of revenue to support the development of safe and affordable housing in Wisconsin. These efforts include acting as grantee, when appropriate, to bring competitive funds into Wisconsin (such as HUD lead hazard control funds), advocating for better enforcement of the state's Interest Bearing Real Estate Escrow Trust Account (IBRETA), and exploring other possible innovations to increase the availability of affordable housing dollars in Wisconsin, including the pursuit of innovative models which can serve as viable tools for the provision of safe and affordable housing.

Finally, DEHCR will continue to examine state policies and procedures to ensure that urban and rural Wisconsin communities are provided equal and appropriate access to the dollars available for affordable housing in the state. The state is also committed to continuing its advocacy for the provision and

expansion of funding for water/wastewater treatment systems, expanded high-speed internet access, economic development opportunities and other public facilities projects in rural areas.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

As part of the response to the issues identified in the previous section, the Division of Energy, Housing and Community Resources remains committed to providing flexibility when possible to local programs in their efforts to address community needs. The Division of Energy, Housing and Community Resources recognizes that local and regional anti-poverty agencies are well-situated to understand and respond to the specific local needs of their individual communities. Therefore, the Division of Energy, Housing and Community Resources will seek to provide funding to help these agencies support housing initiatives as a critical component of their unique mix of programs operating to advance economic self-sufficiency.

To maximize effectiveness and minimize redundancy, the Division of Energy, Housing and Community Resources will also seek to develop or strengthen collaboration with other housing-related agencies in Wisconsin, such as the Wisconsin Housing and Economic Development Authority (WHEDA) and the United States Department of Agriculture-Rural Development (USDA-RD). DEHCR is committed to developing efficiencies and ensuring access to other anti-poverty programs by greater integration between its housing-focused programs and its low-income home energy assistance and state weatherization assistance programs for low-income households. In addition, the Division of Energy, Housing and Community Resources will coordinate with the Department of Children and Families to administer DEHCR's TANF-funded Homeless Case Management Services program which provides case management services for low-income and homeless residents. By collaborating with these agencies, the Division of Energy, Housing and Community Resources maximizes the impact of its dollars and the quality of its program outcomes.

SP-80 Monitoring – 91.330

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

It is the Division of Energy, Housing and Community Resources' policy to monitor each grant at least once during the contract performance period by either an on-site or a desk monitoring. The grantee is monitored for program compliance with all contract requirements and program regulations by reviewing administrative, financial, and project files. The grantee is also required to submit ongoing reports to ensure they are on target for meeting contract requirements. Monitoring is guided by use of an established monitoring checklist which is readily available to all grantees in the program implementation handbook and is posted to the Division's website. Also included in the monitoring is ensuring adherence to minority business outreach. The Division's programs utilize a risk matrix to determine which type of monitoring will occur for each grant.

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The following table summarizes the anticipated resources, broken down by program type, allocated by the Division of Energy, Housing and Community Resources during the Consolidated Plan's planning period (FY 2025-2029).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	27,485,501	20,359,612	12,006,513	59,851,626	109,942,004	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	10,537,811	9,787,972	17,774,303	38,100,086	42,151,245	
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,127,169	0	0	1,127,169	4,508,676	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,571,427	0	0	3,571,427	14,285,708	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Housing Trust Fund	public - federal	Admin and Planning Multifamily rental new construction Multifamily rental rehab	3,295,885	995,332	6,723,736	11,014,953	13,183,542	DEHCR will make awards to eligible recipients to construct and rehabilitate housing for extremely low-income families utilizing HTF funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Economic Development Homeowner rehab Housing Multifamily rental new construction New construction for ownership Public Improvements Short term or transitional housing facilities	0	0	0	0	0	
Other	public - federal	Acquisition Admin and Planning Economic Development Multifamily rental rehab Other	0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-DR	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Homeowner rehab Multifamily rental rehab	0	0	\$15,355,000	\$15,355,000	\$0	
Other	FY2020 ESG-CV	Prevent, prepare for, and respond to coronavirus	0	0	0	0	\$0	
Other	FY2020 CDBG-CV	Prevent, prepare for, and respond to coronavirus	0	0	\$44,006,396	\$44,006,396	\$0	
Other	FY2020 HOPW A-CV	Prevent, prepare for, and respond to coronavirus	0	0	0	0	\$0	

Table 56 - Expected Resources – Priority Table

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

CDBG Economic Development funding is often used as gap financing, allowing it to leverage other sources of funds at the local level. CDBG Public Facilities for Economic Development has a 50% match requirement. CDBG Planning and Public Facilities require a \$1 match for \$2 in CDBG funds awarded. Planning awards for broadband internet expansion do not require match. This requirement is often satisfied using funds from local government and other state or federal agencies.

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

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

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

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

Under CDBG-CLOSE, local match for projects is encouraged, but not required. Funding limits for eligible programs under CDBG-CLOSE are as follows:

9. Public Facilities: \$3,000,000 per project;
10. Housing Rehabilitation: existing CDBG-H costs apply.
11. Economic Development projects: \$3,000,000 per project.
12. Public Facilities for Economic Development projects; \$3,000,000 per project.
13. Planning projects: \$75,000 per project

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

14. Broadband/high speed internet: \$3,000,000 per project.
15. Mitigation measures specifically those that address natural hazard risks: \$3,000,000 per project.
16. Public services: \$300,000 per project

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

The 100% ESG match requirement is met through use of state homeless funds, federal and state programs, local government contributions, cash donations, and donated materials, services, and labor. State funds used to end homelessness include the Homeless Prevention Program, Housing Assistance Program, State Shelter Subsidy Grants, and Critical Assistance program. HOPWA formula grants do not have matching requirements.

HTF funds are administered by the Wisconsin Housing and Economic Development Authority. No match is required by WHEDA; however, additional points are provided to applicants based on non-federal funds applied to the project.

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

Not Applicable.

Discussion

The Division of Energy, Housing and Community Resources will meet with the Wisconsin Housing and Economic Development Authority (WHEDA), the administrator of the Low-Income Housing Tax Credits and the Housing Trust Fund to coordinate affordable housing resources. Members of WHEDA's staff provide advice to DEHCR's Rental Housing Development (RHD) program.

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

If an UGLG retains the responsibility of servicing existing loans, the potential responsibility for re-paying the loan due to the UGLG's failure to meet a National Objective still resides with the UGLG.

Under CDBG-CLOSE, UGLG's must:

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

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitate Owner Occupied Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$23,734,930 HOME: \$5,328,694	Homeowner Housing Rehabilitated: 736 Household Housing Unit
2	Rehabilitate Rental Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$2,116,909 HOME: \$3,576,591 HTF: \$2,003,924	Rental Units rehabilitated: 177 Household Housing Unit
3	Build New Rental Housing	2025	2029	Affordable Housing		Affordable Housing	HOME: \$7,153,181 HTF: \$8,015,697	Rental Units constructed: 88 Household Housing Unit
4	Conversion of Commercial or Public Buildings to Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG:	Rental Units Converted: 1
5	Provide Down Payment Assistance to Homebuyers	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$2,602,599 HOME: \$7,358,673	Direct Financial Assistance to Homebuyers: 410 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Tenant-Based Rental Assistance	2025	2029	Affordable Housing		Affordable Housing	HOME: \$13,629,167	Tenant-based rental assistance / Rapid Rehousing: 2,395 Households Assisted
7	Provide Homeless Assistance	2025	2029	Homeless		Homelessness	ESG: \$3,571,427	Tenant-based rental assistance / Rapid Rehousing: 1,638 Households Assisted Homeless Person Overnight Shelter: 14,000 Persons Assisted Homelessness Prevention: 4,000 Persons Assisted Other: 1,000 Other
8	Assist Communities with Public Facilities Projects	2025	2029	Non-Housing Community Development		Community Development	CDBG: \$25,160,435	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 75,481 Persons Assisted
9	Create Jobs Through ED Assistance and Job Training	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$1,328,047	Jobs created/retained: 38 Jobs
10	Increase Housing Options for Persons with HIV/AIDS	2025	2029	Non-Homeless Special Needs		Special Needs Assistance	HOPWA: \$1,127,169	Tenant-based rental assistance / Rapid Rehousing: 147 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Assist Communities with Emergency Assistance	2025	2029	Homeless Non-Homeless Special Needs Non-Housing Community Development		Affordable Housing Community Development	CDBG: \$2,124,875 CDBG-DR: \$15,355,000	Low/Moderate Income Housing Benefit: 51 Persons Assisted
12	Assist Communities with Local Planning	2025	2029	Non-Housing Community Development		Community Development	CDBG: \$265,609	Other: 11 Other

13	Special Projects	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Affordable Housing Homelessness Special Needs Assistance Community Development Economic Development	CDBG: \$1,593,656	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Facade treatment/business building rehabilitation: 0 Business Brownfield acres remediated: 0 Acre Rental units constructed: 0 Household Housing Unit Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted Homeless Person Overnight Shelter: 0 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 0 Persons Assisted Jobs created/retained: 0 Jobs Businesses assisted: 0 Businesses Assisted Housing for Homeless added: 0 Household Housing Unit Housing for People with HIV/AIDS added: 0 Household Housing Unit HIV/AIDS Housing Operations: 0 Household Housing Unit Buildings Demolished: 0 Buildings Housing Code Enforcement/Foreclosed Property Care: 0 Household Housing Unit Other: 1 Other

Table 57 – Goals Summary

Goal Descriptions

1	Goal Name	Rehabilitate Owner Occupied Housing
	Goal Description	The Division of Energy, Housing and Community Resources will provide funds to rehabilitate owner occupied housing thorough its HOME and CDBG programs. Eligible category for CDBG-CLOSE funding; however, unclear whether or how much funding will be applied for. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.
2	Goal Name	Rehabilitate Rental Housing
	Goal Description	The Division of Energy, Housing and Community Resources will provide funds to rehabilitate rental housing through its HOME and CDBG programs. In addition, DEHCR will make Housing Trust Fund awards to eligible recipients to rehabilitate rental housing for extremely low-income families. Eligible category for CDBG-CLOSE funding; however, unclear whether or how much funding will be applied for. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.
3	Goal Name	Build New Rental Housing
	Goal Description	The Division of Energy, Housing and Community Resources will provide funds to build new rental housing through its HOME program. In addition, DEHCR will make Housing Trust Fund awards to eligible recipients to construct new rental housing for extremely low-income families.

4	Goal Name	Conversion of Commercial or Public Buildings to Housing
	Goal Description	Under the program, authorized under 24 CFR 570.202 (e), local CDBG-Housing RLF's will return all program income to the State. The State will award returned funds for eligible conversion projects to UGLG's utilizing these funds. All existing as well as future program income generated by local CDBG-Housing RLF's will be returned to the State and awarded for eligible CDBG Housing Conversion projects.
5	Goal Name	Provide Down Payment Assistance to Homebuyers
	Goal Description	The Division of Energy, Housing and Community Resources will provide down payment assistance to homebuyers through its CDBG and HOME programs. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.
6	Goal Name	Provide Tenant-Based Rental Assistance
	Goal Description	The Division of Energy, Housing and Community Resources will provide Tenant-Based Rental Assistance (TBRA) to low-income households. DEHCR will also assist persons or families with special needs through its HOME TBRA program.
7	Goal Name	Provide Homeless Assistance
	Goal Description	The Division of Energy, Housing and Community Resources will provide assistance to those experiencing homelessness or at risk of homelessness through its ESG program. The "other" goal outcome indicator refers to the number of persons assisted with street outreach.
8	Goal Name	Assist Communities with Public Facilities Projects
	Goal Description	The Division of Energy, Housing and Community Resources will assist communities with public facilities projects using CDBG funding. Eligible category for CDBG-CLOSE funding; however, unclear whether or how much funding will be applied for. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.

9	Goal Name	Create Jobs Through ED Assistance and Job Training
	Goal Description	The Division of Energy, Housing and Community Resources will create jobs through economic development assistance and job training using CDBG funding. Eligible category for CDBG-CLOSE funding; however, unclear whether or how much funding will be applied for. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years. At this time, the Division has not received any applications for broadband internet projects.
10	Goal Name	Increase Housing Options for Persons with HIV/AIDS
	Goal Description	The Division of Energy, Housing and Community Resources will increase housing options for persons living with HIV/AIDS through its HOPWA program.
11	Goal Name	Assist Communities with Emergency Assistance
	Goal Description	The Division of Energy, Housing and Community Resources will provide emergency assistance to communities to assist low- and moderate-income residents recover from a disaster.
12	Goal Name	Assist Communities with Local Planning
	Goal Description	The Division of Energy, Housing and Community Resources will assist communities with local planning using CDBG funds. The "other" goal outcome indicator refers to the number of communities assisted. Eligible category for CDBG-CLOSE funding; however, unclear whether or how much funding will be applied for. Beginning in 2018, increase the maximum award amount to \$50,000 from \$25,000 and add a 1 for 2 match requirement. For Planning awards for broadband internet expansion, the maximum Planning award is \$75,000 with no match required. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.

13	Goal Name	Special Projects	
	Goal Description	The Division of Energy, Housing and Community Resources will fund special projects as needs arise throughout the state. These projects may be pilot-type projects or may be new activities that the state has not funded in the past. The "other" goal outcome indicator refers to the number of special projects undertaken. Eligible category for CDBG-CLOSE funding; however, unclear whether or how much funding will be applied for. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). This change in methodology is expected to eliminate this source of funding available in subsequent years.	
14	Goal Name	Prevent, prepare for, and respond to coronavirus	
		The Division of Energy, Housing and Community Resources will fund the prevention, preparation for, and response to the coronavirus throughout the state. These projects may be pilot-type projects or may be new activities that the state has not funded in the past. The "other" goal outcome indicator refers to the number of funding sources associated with the goal.	The Division of Energy, Housing and Community Resources will fund the prevention, preparation for, and response to the coronavirus throughout the state. These projects may be pilot-type projects or may be new activities that the state has not funded in the past. The "other" goal outcome indicator refers to the number of funding sources associated with the goal.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The Division of Energy, Housing and Community Resources' funding allocation priorities for the federal formula grant programs of CDBG, HOME, HOPWA, HTF and ESG are outlined in the table below. The percentage of funds allocated is shown by program type and the

associated goal (see previous discussion of goals in SP-45 and AP-20).

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

Funding Allocation Priorities

	Rehabilitate Owner Occupied Housing (%)	Rehabilitate Rental Housing (%)	Build New Rental Housing (%)	Provide Down Payment Assistance to Homebuyers (%)	Provide Tenant- Based Rental Assistance (%)	Provide Homeless Assistance (%)	Assist Communities with Public Facilities Projects (%)	Create Jobs Through ED Assistance and Job Training (%)	Increase Housing Options for Persons with HIV/AIDS (%)	Assist Communities with Emergency Assistance (%)	Assist Communities with Local Planning (%)	Special Projects (%)
CDBG	41%	4%	0	4%	0	0	42%	1%	0	4%	1%	3%
HOME	14%	8%	18%	18%	38%	0	0	0	0	0	0	0%
HOPWA	0	0	0	0	0	0	0	0	100	0	0	0
ESG	0	0	0	0	0	100	0	0	0	0	0	0
HTF	0	20%	80%	0	0	0	0	0	0	0	0	0
Other CDBG- DR	0	0	0	0	0	0	0	0	0	100	0	0

Table 58 – Funding Allocation Priorities

Reason for Allocation Priorities

The allocation priorities shown above are a reflection of the needs of the state and the restrictions of the programs. The Needs Assessment and Market Analysis showed a statewide need for affordable housing, homeless and special needs assistance, and community and economic development. Each of these priorities is addressed by the allocation and is addressed by the program and funding type best suited to respond to the needs of the state. Funds contained in housing revolving loan funds may be used for owner occupied rehabilitation, rental rehabilitation,

security deposits for those at risk of homelessness or experiencing homelessness, or down payment assistance. Therefore, an estimated \$20,359,612 of CDBG funding used to further housing related goals will be collected by local housing revolving loan funds.

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

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

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

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

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

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

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

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

Under CDBG-CLOSE, UGLG's must:

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

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

- 1. Public Facilities;
- 2. Housing Rehabilitation Conversion;

3. Economic Development projects;
4. Public Facilities for Economic Development projects;
5. Planning projects

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

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

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

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

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

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

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

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

Introduction:

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

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

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

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

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

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

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

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

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

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

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

Distribution Methods

Table 59 - Distribution Methods by State Program

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

	Describe the state program addressed by the Method of Distribution.	The CDBG Economic Development program provides funds to local government to assist with business expansion and retention. Examples of eligible activities include business loans to expand facilities, purchase equipment, and employee training. The activity must result in job opportunities for low to moderate income individuals. In previous years, CDBG-SF funds were only allowed to be utilized for CDBG-Public Facilities for Economic Development awards. Beginning in program year 2019, DEHCR will expend funds formerly designated as CDBG SF as CDBG PI in order to satisfy the requirements of 24 CFR 570.489(f)(2). These funds will be spent in a fungible fashion with grant funds. This change in methodology is expected to eliminate this source of funding available in subsequent years. UGLG's that currently administer an Economic Development RLF are <u>required</u> to participate in CDBG-CLOSE. Under CDBG-CLOSE, all locally held, and funded by a CDBG award made on January 1, 1992 or later, Economic Development RLF as well as current Economic Development RLF accounts receivable will be held for UGLG's. These UGLG's will have non- competitive access to the funds to use as grants for eligible activities. There are three ways UGLG's will participate in CDBG-CLOSE. First, UGLG's that do not have <u>any</u> outstanding, current loans and <u>only</u> have cash on hand will receive credit for their RLF bank balance as grant funding. Under this option, UGLG's RLF Closeout Account will be determined as follows: RLF Bank Balance = RLF Closeout Account UGLG's with outstanding loans have the option under CDBG-CLOSE to either: 1. <u>Purchase</u> the value of <u>all</u> outstanding loans in the RLF portfolio and transfer those funds to DEHCR; 2. <u>Retain the responsibility to</u> service outstanding loans locally.
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		Under CDBG-CLOSE, UGLG's that opt to <u>purchase</u> all outstanding loans will receive their RLF bank balance plus their purchase of their outstanding balance as grant funding. Under this option, UGLG's RLF Closeout Account will be determined as follows: $\text{RLF Bank Balance} + \text{Purchased RLF Accounts Receivable} = \text{RLF Closeout Account}$ Under CDBG-CLOSE, UGLG's that opt to <u>retain the responsibility to</u> service outstanding loans locally will only receive credit for their RLF bank balance as grant funding. Under this option, UGLG's RLF Closeout Account will be determined as follows: $\text{RLF Bank Balance} = \text{RLF Closeout Account}$ DEHCR will enter into a written agreement with all UGLG's that opt to retain the responsibility to service all outstanding loans. UGLG's must return all applicable loan repayments to the State. Amounts received by the State will be committed to specific UGLG awards; and, as sufficient amounts are accumulated these funds will be committed ahead of grant funds for any new awards. Amounts received will not displace grant funding from other UGLG's grant-funded awards.
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Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The primary criteria used to select applications for funding are: • the three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • activities listed must be eligible activities • need for the funding All Revolving Loan Fund Accounts that were originally capitalized by a CDBG award from the State of Wisconsin prior to January 1, 1992 <u>and</u> have not received a subsequent award from January 1, 1992 to present from the State of Wisconsin <u>and</u> the State has closed out the source grant from which funds were originally used to capitalize the RLF <u>and</u> HUD has closed out the CDBG grant between HUD and the State for the original source year that capitalized the RLF are not subject to CDBG-CLOSE. These funds qualify under the program income reporting guidelines as defined in CPD Notice 04-11.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Applications are available on the DEHCR website. The CDBG-CLOSE application packet is included in the Appendices.

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

	Describe how resources will be allocated among funding categories.	Applications and handbooks are available on the DEHCR website. Eligible recipients may utilize their RLF Closeout grant award for the currently authorized programs as outlined in the State of Wisconsin 2025-2029 Consolidated Plan without the matching funds requirement: 1. Public Facilities; 2. Housing Rehabilitation Conversion; 3. Economic Development projects; 4. Public Facilities for Economic Development projects; 5. Planning projects In addition to the programs identified above, the RLF Closeout Account can be used for the following special purposes: 6. Broadband/high speed internet access for low and moderate income (LMI) residents. grant funds can be used by the Unit of General Local Government (UGLG) for public infrastructure projects to expand broadband internet access. Examples of eligible expenses include the purchase of materials and installation. 7. Mitigation measures specifically those that address natural hazard risks; must connect the mitigation development or action to address impacts on LMI residents. 8. Public services.
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Describe threshold factors and grant size limits.	Resource allocation to CDBG Economic Development will be based upon several factors, including: • the number of applications received • historical funding amounts • State of Wisconsin needs • DEHCR priorities • Funding limits for eligible programs under CDBG-CLOSE are as follows: Public Facilities: \$3,000,000 per project; Housing Rehabilitation: existing CDBG-H costs apply; Economic Development projects: \$3,000,000 per project; Public Facilities for Economic Development projects: \$3,000,000 per project; Planning projects: \$75,000 per project In addition to the programs identified above, the RLF Closeout Account can be used for the following special purposes: Broadband/high speed internet: \$3,000,000 per project; Mitigation measures specifically those that address natural hazard risks: \$3,000,000 per project; Public services: \$300,000 per project
What are the outcome measures expected as a result of the method of distribution?	The State will publish an updated listing of current RLF accounts in its final, approved Annual Action Plan. Published amounts are estimates as they do not reflect current loan and repayment activity. See Attachments. Grantees have up to twenty-four (24) months from the start date of the CDBG-CLOSE program as defined by the State to submit an application for funding to DEHCR. Project activities must usually be completed within twenty-four (24) months from the date the funding is awarded (RLFs with large balances may be allowed additional time). Funds not disbursed within the specified time limit may be recaptured by DEHCR for reallocation to any other eligible CDBG project. All grant agreements will incorporate timelines to assure the project is on track to have successful completion within the grant term.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Applicants to the ESG program are lead agencies representing geographically distributed groups of homeless service providers. All lead agencies must complete the ESG application according to guidelines. DEHCR apportions the funding amongst the applicants using a formula applied by DEHCR. The formula's elements include a number of measures of homelessness and poverty, as well as measures of the efficiency and effectiveness of individual homeless service providers. Additional variables may be added as additional data becomes available in order to best distribute funding according to the needs of communities and performance of homeless service providers.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	n/a
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	The formula described above is used to give each homeless coalition or HUD continua of care an allocation. While staying within HUD and DEHCR limitations, each local homeless coalition or HUD CoC must allocate their portion of the funds to local projects based on local needs. Homeless coalition or HUD continua then submit their Consolidated Application to DEHCR for approval. The application contains their proposed projects, and justification for funding these projects. If DEHCR does not find problems during technical review, DEHCR approves the application and funds the agencies at the proposed levels. Local homeless coalitions are made up of the homeless service providers in each community, including local units of government, community and faith-based organizations, and area nonprofits. Decisions about which agencies receive funding and how much funding they receive are local decisions.

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	Resources are allocated according to funding floors established by HEARTH and in order to promote best practices and priorities established by the DECHR. Local homeless coalitions then decide how to fund agencies within these limitations.
	Describe threshold factors and grant size limits.	Grant awards are based on the amount of funding received from HUD, and the funding formula (described above) is used to distribute funds to local Continua of Care.
	What are the outcome measures expected as a result of the method of distribution?	

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

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

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

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

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

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

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

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

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

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

	What are the outcome measures expected as a result of the method of distribution?	The outcome measures are numbers of HOPWA eligible persons and their families who receive housing assistance and supportive services necessary to maintain housing.
13	State Program Name:	Housing Trust Fund
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	HTF provides additional resources to construct and rehabilitate housing for extremely low-income Wisconsin families.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	DEHCR developed its HTF Allocation Plan and it is included in the Attachments.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	n/a

	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	n/a
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	n/a
	Describe how resources will be allocated among funding categories.	DEHCR developed its HTF Allocation Plan and it is included in the Attachments.
	Describe threshold factors and grant size limits.	HTF funds are received by DEHCR from HUD as a formula grant annually. DEHCR will utilize the per unit subsidy limits for the HOME program.

	What are the outcome measures expected as a result of the method of distribution?	The outcome measures are numbers of new and rehabilitated housing units created with HTF funds annually.
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Discussion:

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

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

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

25 CDBG HOUSING PROGRAM - REGIONS & RLF

UGLG	BALANCE	CONTACT PERSON	CONTACT PHONE	CONTACT EMAIL
Adams County	\$ 87,887.56	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Ashland County	\$ 9,308.72	Denise Lutz	715.274.8311	dlutz@ashlandcoha.org
Barron County	\$ 20,962.32	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Bayfield County	\$ 17,865.24	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Brown County	\$ 29,279.91	Todd Mead	920.448.6485	todd.mead@browncountywi.gov
Chippewa County	\$ 176,920.90	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Algoma	\$ 30,710.64	Jamie Jackson	920.487.5203	jamie.jackson@algomacity.org
City of Amery	\$ 16,501.85	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Antigo	\$ 364,799.10	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com

City of Ashland	\$ 73,222.98	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Augusta	\$ 51,300.70	Georgia Crownhart	715.839.6230	georgia.crownhart@eauclairecounty.gov
City of Baraboo	\$ 392,204.92	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Bayfield	\$ 2,532.93	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Beaver Dam	\$ 96,281.09	Susan Maier	9203925143	smaier@msa-ps.com
City of Black River Falls	\$ 118,223.00	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
City of Blair	\$ 2,506.30	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
City of Bloomer	\$ 46,459.10	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Chetek	\$ 170,369.06	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Chippewa Falls	\$ 164,916.17	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Clintonville	\$ 67,334.49	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
City of Cornell	\$ 205,807.79	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Crandon	\$ 85,964.59	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Durand	\$ 193,150.66	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
City of Edgerton	\$ 203.69	Susan Maier	9203925143	smaier@msa-ps.com
City of Elroy	\$ 109,012.07	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Evansville	\$ 270,936.17	Kari Justmann	920-392-5137	Kjustmann@msa-ps.com
City of Fox Lake	\$ 41,503.18	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Galesville	\$ 61,708.78	Jennifer Hess	608.582.2475	treasurer@citygalesvillewi.gov
City of Glenwood City	\$ 69,088.66	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
City of Greenwood	\$ 60,222.68	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com

City of Hartford	\$ 53,585.43	Lisa Sellinger	2626703772	lsellinger@ci.hartford.wi.us
City of Hillsboro	\$ 35,963.96	Sara Berger	608.385.4143	sara.berger@couleecap.org
City of Juneau	\$ 69,128.25	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
City of Ladysmith	\$ 123,385.54	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Lancaster	\$ 108,985.22	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
City of Loyal	\$ 117,732.81	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Manitowoc	\$ 415,784.69	Susan Maier	9203925143	smaier@msa-ps.com
City of Marinette	\$ 0.01	Discontinued	Discontinued	Discontinued
City of Marion	\$ 59,124.74	Kaitlin Gabrielson	715.752.4620	kgabrielson1@gmail.com
City of Marshfield	\$ 0.01	Julie Oleson	608.847.7309	juncoha@frontier.com
City of Mauston	\$ 82,879.32	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
City of Menasha	\$ 348,659.39	Alison Humski	920.967.3650	ahumski@menashawi.gov
City of Menomonie	\$ 132,535.93	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
City of Merrill	\$ 163,130.84	Lori Anderson-Malm	715.536.4880	lori.anderson-malm@ci.merrill.wi.us
City of Milton	\$ 75,147.92	Susan Maier	9203925143	smaier@msa-ps.com
City of Mondovi	\$ 140,665.44	Michelle Loken	715.926.3866	cityadmin@mondoviwi.gov
City of Mosinee	\$ 80,131.77	Kaitlin Gabrielson	715.752.4620	kgabrielson1@gmail.com
City of Neillsville	\$ 96,762.21	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Nekoosa	\$ 75,961.96	Susan Maier	920.392.5143	smaier@msa-ps.com
City of New Lisbon	\$ 39,321.77	Susan Maier	920.392.5143	smaier@msa-ps.com
City of New London	\$ 26,754.23	Kaitlin Gabrielson	715.752.4620	kgabrielson1@gmail.com

City of New Richmond	\$ 14,338.04	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
City of Omro	\$ 14,775.68	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Owen	\$ 64,258.77	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Park Falls	\$ 87,680.90	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Phillips	\$ 228,226.66	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Pittsville	\$ 154,985.19	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
City of Platteville	\$ 251,613.91	Lori Olson Pink	608.953.2326	l.olson-pink@swcap.org
City of Plymouth	\$ 187,338.49	Susan Maier	9203925143	smaier@msa-ps.com
City of Portage	\$ 174,006.17	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Prairie du Chien	\$ 12,077.59	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
City of Reedsburg	\$ 45,681.49	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Rhinelander	\$ 259,348.46	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Rice Lake	\$ 144,549.66	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Richland Center	\$ 164,900.18	Amanda Keller	608.647.3466	clerk@richlandcenterwi.gov
City of Ripon	\$ 39,145.20	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
City of Shawano	\$ 86,982.06	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
City of Shell Lake	\$ 16,112.74	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Spooner	\$ 264,070.25	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Stanley	\$ 176,383.14	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
City of Stevens Point	\$ 344,699.76	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
City of Thorp	\$ 168,095.78	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com

City of Tomahawk	\$ 48,692.52	Amanda Bartz	715.453.4040	clerk-treasurer@cityoftomahawk.com
City of Two Rivers	\$ 178,926.01	Susan Maier	9203925143	smaier@msa-ps.com
City of Viroqua	\$ 2,096.38	Sara Berger	608.385.4143	sara.berger@couleecap.org
City of Washburn	\$ 358,248.57	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
City of Watertown	\$ 127,652.40	Susan Maier	9203925143	smaier@msa-ps.com
City of Waupaca	\$ 167,262.12	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
City of Waupun	\$ 226,335.48	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
City of Wautoma	\$ 164,419.46	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
City of Westby	\$ 5,527.33	Sara Berger	608.385.4143	sara.berger@couleecap.org
City of Weyauwega	\$ 91,462.61	Kaitlin Gabrielson	715.752.4620	kgabrielson1@gmail.com
City of Whitewater	\$ 5,248.98	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
City of Wisconsin Dells	\$ 111,688.54	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
City of Wisconsin Rapids	\$ 613,732.65	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Clark County	\$ 342,204.67	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Columbia County	\$ 253,950.15	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
Crawford County	\$ 76,364.92	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Dodge County	\$ 61,658.89	Kari Justmann	920.392.5137	kjustmann@msa-ps.com
Douglas County	\$ 7,778.78	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Dunn County	\$ 101,928.22	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Eau Claire County	\$ 121,067.91	Georgia Crownhart	715.839.6230	georgia.crownhart@eauclairecounty.gov
Grant County	\$ 66,051.43	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net

Green County	\$ 198,310.62	Lori Olson-Pink	608-935-2326	l.olson-pink@swcap.org
Green Lake County	\$ 50,032.41	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Iron County	\$ 20,503.62	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Jackson County	\$ 40,780.49	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Juneau County	\$ 0.01	Julie Oleson	608.847.7309	juncoha@frontier.com
Kenosha County	\$ 164.74	Chris Parisey	262.857.1843	Christopher.Parisey@kenoshacounty.org
Langlade County	\$ 106,527.34	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Marquette County	\$ 1,394.72	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Pierce County	\$ 44,998.55	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Polk County	\$ 109,136.15	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Rock County	\$ 917,083.05	Todd Mandel	608.258.5560	toddmandel@wphd.org
Rusk County	\$ 123,981.99	Carolyn Martin	715.532.2271	carolynfayemartin@gmail.com
Sauk County	\$ 20,060.66	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Sawyer County	\$ 27,268.05	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Shawano County	\$ 42,925.34	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Taylor County	\$ 139,909.10	Sam Zipprich	715.748.1456	Sam.zipprich@co.taylor.wi.us
Town of Bear Creek	\$ 57,525.84	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Town of Birnamwood	\$ 2,429.05	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Town of Colby	\$ 14,742.59	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Town of Dupont	\$ 55,186.94	Kaytlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Town of Grant	\$ 125,861.83	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com

Town of Johnson	\$ 23,399.94	Marilyn Bhend	715.581.7006	clerk@townofjohnsonwi.gov
Town of Jump River	\$ 77,542.08	Carolyn Martin	715.532.2271	carolynfayemartin@gmail.com
Town of Laona	\$ 87,559.00	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Town of Lynn	\$ 50,433.87	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Town of Marshall	\$ 27,246.14	Carolyn Martin	715.532.2271	carolynfayemartin@gmail.com
Town of Pine Grove	\$ 74,749.81	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Town of Rock Elm	\$ 89,471.11	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Town of Sand Lake	\$ 12,591.12	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Town of Stone Lake	\$ 97,931.72	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Town of Swiss	\$ 27,473.39	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Town of Thorp	\$ 81,668.81	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Town of Union	\$ 112,471.96	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Town of Wabeno	\$ 100,747.12	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Town of Williamstown	\$ 85,477.19	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Town of Withee	\$ 4,572.40	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Vernon County	\$ 837.46	Sara Berger	608.385.4143	sara.berger@couleecap.org
Village of Alma Center	\$ 8,209.80	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Athens	\$ 154,530.52	Lisa Czech	715.257.9170	athensclerk@villageofathens.com
Village of Avoca	\$ 79,295.52	Liz Wilkinson	608.532.6831	lizvilavoca@gmail.com
Village of Bagley	\$ 81,887.15	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Balsam Lake	\$ 51,368.80	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com

Village of Bay City	\$ 128,758.04	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Bear Creek	\$ 60,233.77	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Birchwood	\$ 130,878.12	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Village of Birnamwood	\$ 154,781.21	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Blue River	\$ 99,382.25	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Boyceville	\$ 18,618.01	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Boyd	\$ 25,547.36	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Village of Cadott	\$ 72,537.88	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Village of Cameron	\$ 78,081.53	Carolyn Martin	715.532.2271	carolynfayemartin@gmail.com
Village of Camp Douglas	\$ 82,177.57	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Casseville	\$ 58,710.77	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Cazenovia	\$ 13,581.68	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Clayton	\$ 84,639.92	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Clyman	\$ 40,468.46	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Colfax	\$ 21,232.56	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Darien	\$ 172,308.57	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Dorchester	\$ 104,823.89	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Dresser	\$ 55,391.60	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Eastman	\$ 74,687.37	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Edgar	\$ 2,768.67	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Eland	\$ 0.01	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com

Village of Eleva	\$ 245,423.89	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Ellsworth	\$ 58,761.80	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Fairchild	\$ 22,538.32	Georgia Crownhart	715.839.6230	Georgia.crownhart@eauclairecounty.gov
Village of Footville	\$ 6,305.67	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Friesland	\$ 1,788.18	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Gays Mills	\$ 92,395.45	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Gilman	\$ 42,303.25	Sam Zipprich	715.748.1456	Sam.zipprich@co.taylor.wi.us
Village of Granton	\$ 21,580.96	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Village of Gresham	\$ 64,609.17	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Hancock	\$ 31,949.57	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Village of Huster	\$ 55,969.75	Joyce Duescher	608.427.6575	hustler@mwt.net
Village of Iola	\$ 138,237.97	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Junction City	\$ 14,662.83	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Village of Knapp	\$ 24,848.91	Melissa Schultz	715.665.2495	knappclerk@aldwin-telecom.net
Village of La Valle	\$72,870.81			-
Village of Linden	\$ 129,051.35	Susan Linder	608.623.2800	clerk@villageoflinden.com
Village of Lowell	\$ 55,161.46	Susan Maier	920.392.5143	smaier@msa-ps.com
Village of Luck	\$114,951.39	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Town/Village of Maiden Rock	\$ 31,267.65	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Mattoon	\$ 3,804.76	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Mazomanie	\$ 121,945.84	Lori Bekkum	608.3267333	lbekkum@developmentplanning.net
Village of Milltown	\$ 83,021.59	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com

Village of New Auburn	\$ 120,472.29	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Village of North Fond du Lac	\$ 57,009.09	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Ontario	\$ 17,550.83	Sara Berger	608.796.2915	sara.berger@couleecap.org
Village of Oxford	\$ 63,167.22	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Pepin	\$ 14,907.01	Julie Wheeler	715.442.2461	clerk@pepinwisconsin.org
Village of Plainfield	\$ 52,912.33	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Village of Plum City	\$ 109,975.81	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Prairie Farm	\$ 10,450.15	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Prentice	\$ 39,194.35	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Village of Randolph	\$ 172,401.24	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Readstown	\$ 116,505.88	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Redgranite	\$ 98,998.42	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Village of Rib Lake	\$ 251,928.62	Sam Zipprich	715.748.1456	Sam.zipprich@co.taylor.wi.us
Village of Rio	\$ 94,529.24	Amy Stone	920.992.5454	astone@riowi.us
Village of Rudolph	\$ 47,781.29	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Village of Sharon	\$ 77,954.91	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Soldiers Grove	\$ 1,199.61	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Somerset	\$ 31,339.14	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Spencer	\$ 124,334.93	Chris Helgestad	715.659.5423	clerk@vil.spencer.wi.us
Village of Spring Valley	\$ 29,650.74	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Stratford	\$ 64,807.22	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com

Village of Superior	\$ 88,671.72	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Village of Taylor	\$ 68,779.72	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Tigerton	\$ 138,790.56	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Turtle Lake	\$ 64,578.57	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Village of Wauzeka	\$ 49,331.64	Lori Bekkum	608.326.7333	lbekkum@developmentplanning.net
Village of Webster/Siren	\$ 31,579.62	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Village of Wild Rose	\$ 97,236.53	Kaitlin Gabrielson	715.752.4620	Kgabrielson1@gmail.com
Village of Wilton	\$ 221,416.07	Sara Berger	608.632.6512	sara.berger@couleecap.org
Village of Winneconne	\$ 34,068.89	Logan Fuller	920.582.4381	administrator@winneconnewi.gov
Village of Withee	\$ 15,526.93	Bliss Sengbusch	715.726.4573	bsengbusch@chippewacountywi.gov
Village of Woodville	\$ 59,538.80	Renee Swenson	715.235.9081	renee.swenson@cedarcorp.com
Village of Wyocena	\$ 38,788.49	Kari Justmann	920.392.5137	Kjustmann@msa-ps.com
Washburn County	\$ 87,860.18	Sheldon Johnson	715.635.2197	sjohnson@nwrpc.com
Waushara County	\$ 96,319.79	Amy Michelkamp	715.343.7193	amichelkamp@capmail.org
Wood County	\$ 14,311.85	Julie Oleson	608.847.7309	joleson.jcha@gmail.com

AP-35 Projects – (Optional)

Introduction:

The state has not identified site specific projects for 2025 at this time. Funding allocations for CDBG, HOME, ESG, HOPWA and HTF projects will not be determined until program-specific applications are received and evaluated. Only entitlement communities report projects under this section.

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

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

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

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

#	Project Name

Table 60 – Project Information

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

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

AP-38 Project Summary

Project Summary Information

Not applicable

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

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

No.

Available Grant Amounts

Not Applicable.

Acceptance process of applications

Not Applicable.

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

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

No

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

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

AP-50 Geographic Distribution – 91.320(f)

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

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

Geographic Distribution

Target Area	Percentage of Funds

Table 61 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

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

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

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

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

Housing Tax Credit program.

Discussion

Affordable Housing

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

Introduction:

In the tables below the Division of Energy, Housing and Community Resources (DEHCR) PY2025 goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing are listed. Affordable housing support will be provided through multiple program activities including, rental assistance, construction of new units, rehabilitation of existing units, and potentially acquisition of existing units. The estimates do not include the provision of homeless services such as emergency shelter, etc.

One Year Goals for the Number of Households to be Supported	
Homeless	671
Non-Homeless	1,412
Special-Needs	1,725
Total	3,808

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2,396
The Production of New Units	88
Rehab of Existing Units	914
Acquisition of Existing Units	410
Total	3,808

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

Discussion:

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

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

Introduction:

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

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

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

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

Not Applicable.

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

Not Applicable.

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

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

Discussion:

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

Introduction

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

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

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

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

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

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

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

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

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

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

Discussion

AP-70 HOPWA Goals – 91.320(k)(4)

One-year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	147
Tenant-based rental assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	147

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

Introduction:

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

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

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

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

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

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

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

or families in Wisconsin.

Discussion:

AP-85 Other Actions – 91.320(j)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

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

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

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

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

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

programs and resources.

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

Actions planned to foster and maintain affordable housing

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

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

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

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

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

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

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

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

Actions planned to reduce lead-based paint hazards

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

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

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

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

Actions planned to reduce the number of poverty-level families

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

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

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

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

Actions planned to develop institutional structure

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

ability to support appropriate economic development projects.

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

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

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

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

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

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

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

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

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

Discussion:

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

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

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

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

organizations and local governments.

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

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

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

- | | |
|---|--------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan | \$20,359,612 |
| 3. The amount of surplus funds from urban renewal settlements | \$0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. | \$0 |
| 5. The amount of income from float-funded activities | \$0 |

Total Program Income: **\$20,359,612**

Other CDBG Requirements

- | | |
|--|-----|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low-and moderate-income. | 85% |
| 3. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate-income. Specify the years covered that include this Annual Action Plan. | 1 |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

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

DEHCR utilizes only forms of investment included in Section 92.205.

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

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

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

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

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

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

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

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

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

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

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

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

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

Housing Opportunities for Persons with AIDS Program (HOPWA)

Inserted under "Add Text" link

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

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

Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family totals: 147

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

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

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

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

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

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

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

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

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

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

5. Describe performance standards for evaluating ESG.

ESG funding is allocated using a funding formula which takes into account factors such as regional homelessness, local performance in preventing and ending homelessness, poverty levels, and other indicators of the extent of homelessness in each HUD and local Continuum of Care. Recently, DEHCR created a performance measure to include in the funding formula, which incentivizes efficient and effective use of ESG funds. The ESG program will continue to measure the performance of recipients and sub-recipients and encourage the use of evidence-based practices in service delivery.

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

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

☒ Applications submitted by eligible recipients

Subgrantees that are State Agencies

Subgrantees that are HUD-CPD entitlement grantees

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

N/A

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

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Please see attached Allocation Plan.

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

Yes.

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

Yes.

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

Yes.

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

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

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

Please see attached Allocation Plan.

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

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

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

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

N/A

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

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

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

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

Please see attached Allocation Plan.

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

N/A

Discussion:



STATE OF WISCONSIN NATIONAL HOUSING TRUST FUND ALLOCATION PLAN

Fiscal Year 2025

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

State: Wisconsin
3,295,885.42

FY 2025 HTF Allocation Amount: \$

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

For years in which the total national funding is under \$1 billion, 100% of each state's allocation must go towards benefiting extremely low income (ELI) households, specifically households at or below 30% of area median income or households with income below federal poverty level (greater of). DEHCR anticipates that 100% of funding will be targeted towards these rental households for the foreseeable future. The total national funding for 2025 is \$223 million.

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

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

Funding Availability

DEHCR anticipates allocating the PY 2025 award on a rolling basis throughout the year as well as in conjunction with the application process for HOME-Rental Housing Development awards. Requests for Proposals (RFPs) may be released describing eligible applicants, activities, threshold items, scoring priorities, application deadlines, and an overview of both the review and awarding process. DEHCR has identified the following objectives for the National Housing Trust Funds: expanding the quantity of extremely low-income housing by allocating dollars to both Housing Tax Credit properties and non-Housing Tax Credit multifamily developments. DEHCR will not be providing Housing Trust Funds to subgrantees.

Award Structure

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

Affordability Period

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

Maximum Per-Unit Subsidy

NHTF expenditures must be reasonable and based on actual costs. Maximum per-unit subsidy is the same as Wisconsin's 2025 HOME maximum per-unit subsidy limits as determined by HUD (Section 234 Basic Limits Per No. of Bedrooms).

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

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

Application Process

1. DEHCR intends to make an application packet available for the HTF program or may rely upon applications submitted for alternative resources where authorized. The application will include the funding criteria, as described but not limited to items on the following pages, application evaluation process, timeline for commitment and expenditure of funds, etc. Materials will be available on DEHCR's website:
<https://energyandhousing.wi.gov/Pages/Housing.aspx>
2. Applicants will be evaluated by a staff level review committee and will be reviewed and selected with consideration being given to both the below threshold as well as priority funding criteria.

Threshold:

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

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

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

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

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

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

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

Performance Goals and Benchmarks

DEHCR expects that in PY25, NHTF will support approximately **five** new or preserved housing developments and will create approximately 74 units with rents affordable to extremely low-income

households. Recipients will be responsible for compliance with applicable reporting, file and physical inspections, and record keeping requirements.

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

Development Quality

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

- The Fair Housing and Americans with Disabilities Act:
 - Section 504 of the Rehabilitation Act: For newly constructed housing, a minimum of five percent (5%) of the total dwelling units or at least one unit in a multi-family housing project, whichever is greater, shall be made accessible for persons with mobility impairments. An additional two percent (2%) of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments. For rehabilitation of existing housing: If alterations are undertaken to a housing facility that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, then five percent of the total dwelling units or at least one unit, whichever is greater, shall be made accessible for persons with mobility impairments. An additional two percent of the units (but not less than one unit) shall be accessible for persons with hearing or vision impairments. Alterations to dwelling units in a multi-family housing project (including public housing) shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with handicaps. If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible.
- Lead-Based paint provisions noted in 24 CFR part 35: For properties originally constructed before 1978: HTF recipients will be required to complete an inspection for the existence of lead-based paint. If lead-based paint is discovered, the rehabilitation plan must include the removal of the lead-based paint, or a detailed description of how the proposed renovation will comply with the EPA's Renovation, Repair and Painting Program. All rehabilitation must comply with HUD's Lead Safe Housing Rule (LSHR).
- Design and Construction requirements noted in 24 CFR 100.205.

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

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

DEHCR will not permit HTF resources to be used in buildings that are located within a 100-year flood plain. Portions of the site may be located in the 100-year flood plain but may not include parking areas or the footprint of the residential units or accessory buildings. All properties receiving HTF resources must comply with the State of Wisconsin Hazard Mitigation Plan, the 2009 edition of the International Building Code® and the International Existing Building Code®. The Hazard Mitigation plan can be found at <https://wem.wi.gov/state-planning/>

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

Construction and Rehabilitation

Standards Rehabilitation Standards

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

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

All rehabilitation proposals must comply with Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2018 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. Chapter SPS 366 can be found at [Admin Code SPS 366](http://codes.iccsafe.org/I-Codes.html) and <http://codes.iccsafe.org/I-Codes.html>.

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

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

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

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

Exhibit A

***Wisconsin HTF Rehabilitation Standards
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A. Site Conditions

1. Site Drainage

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

2. Concrete and Masonry

- a. Cracks in concrete and/or masonry porches, steps or landings more than ¼ inch wide and change in elevation more than ½ inch tall shall be corrected.
- b. Foundations: Cracking, spalling, excessive bowing (bulges vertically), sweeping (bulges horizontally), leaning, and mortar deterioration shall be corrected. Cracks 1/8 inch and larger shall be corrected.

3. Accessory Buildings

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

4. Trees and Shrubs

- a. Landscaping shall not pose any health or safety hazard.
- b. Trees near the foundation shall not cause an immediate or potential drainage and/or structural problem.
- c. Excessive bushes and trees shall not cause health or safety hazards (overgrown areas).
- d. Dead branches and/or trees, which pose a hazard of falling and/or causing personal harm or property damage, shall be removed.

5. Refrigerator/Stoves

- a. It is recommended that the appliance(s) be replaced if any of the following conditions exist:
 - 1. Broken or missing shelving.
 - 2. Deteriorated seals.

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

B. Exterior Wall Assembly Standards

- a. All exterior walls shall be reasonably weather tight as to prevent moisture from entering the building and preventing heat from leaving the building.
- c. All siding and exterior wall coverings shall be free of loose, cracked, broken and/or missing sections.
- d. Painted surfaces shall be free of deteriorated paint.
- e. Crawl space access panels and vents shall be in good repair.
- f. Basement/Cellar doors and access panels shall be in good repair.

C. Floor Standards

1. Wood Floor Standards

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

2. Floor Sheathing

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

3. Floor Finishes

- a. Floor finishes shall be in good repair, securely fastened, and free of any tripping hazards.
- b. Sub-flooring and cement floors, in living spaces, shall be covered with carpeting or other approved floor finishes.

4. Toilet, Bath, Shower, and Kitchen Spaces

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

D. Windows and Doors

1. Windows

- a. Window panes that are cracked or broken shall be repaired or replaced.
- b. Any deteriorated components of window units shall be corrected.
- c. All windows shall have properly operating locks and hardware.
- d. Damaged storm windows or screens creating a possible safety hazard shall be repaired or removed.

2. Interior/Exterior Doors

- a. All door hardware shall be present and in good working condition.
- b. Interior and exterior doors shall be in good condition.
- c. Door units shall be weather-stripped to prevent air infiltration.
- d. Doors shall be located in the following areas: attic areas where there is a staircase, bathrooms, shower rooms, and basement entrances.

E. Partition Standards

1. Wall Coverings

- a. All wall coverings shall be securely fastened to the wall assembly.
- b. Wall coverings shall be free from excessively loose material, large gouges, holes, and cracks.

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

2. Bathrooms and Kitchens

- a. Bathtubs with showerheads and shower compartments shall be finished with a nonabsorbent surface. Such wall surfaces shall extend to a height of not less than six feet above the floor.
- b. If mildew is present, measures shall be taken to prevent future mildew as well as removing the current mildew.

F. Stair Standards

1. Stairs

- a. Staircases and stairwells shall be in good repair.
- b. Stairs shall not pose a tripping hazard.
- c. Deteriorated, missing or otherwise defective tread, risers, stringers or the supporting structure shall be corrected.

2. Illumination

- a. All exterior and interior stairways shall be provided with illumination of the stairs, landings, and treads.
- b. Exterior stairways shall have an artificial light source located in the immediate vicinity of the top landing of the stairway.
- c. Exterior stairways providing access to a basement from the outside grade level shall have an artificial light source in the immediate vicinity of the bottom landing of the stairway.
- d. The control for the illumination of interior stairways shall be accessible in habitable areas without traversing any step of the stairway. The control for the illumination of exterior stairways shall be located inside the dwelling unit. Lights that are continuously illuminated or automatically activated are exempt from the control standards.

3. Handrail

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Guardrai

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Handrail

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

Guardrails

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

G. Ceiling Standards

1. Ceiling Performance

- a. Ceiling framing shall be in good repair and free from structural defects.
- b. Acoustical tile and suspended ceilings shall be in good repair.

- c. Ceilings that excessively sag shall be corrected.
- d. Any bulging, holes, or loose plaster shall be corrected.

2. Attic Access

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

3. Insulation Clearance

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

4. Exhaust Ducts and Plumbing Stack Terminations

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

H. Roofs

1. Re-roofing

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

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

2. Sheathing

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

3. Underlayments and Moisture Barriers

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

4. Shingles

- a. Shingles must be replaced if one of the following exists: missing, excessive curling, cupping, or deterioration.
- b. Shingles installed on a roof slope below Code requirements for shingles shall be removed and an approved covering installed.

5. Flat Roofs

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

6. Flashing

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

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

7. Gutters & Downspouts

- a. Missing, sagging, or deteriorated gutters must be repaired or replaced.
- b. Downspouts shall be color coordinated with gutters and shall be proportional in size to the drainage needs of the roof.
- c. Gutters shall be supported as per the manufacturer's specifications with spikes and ferrules, wrap-around straphangers, or with hidden hangers.
- d. Downspouts shall be securely attached to the house and connected to an exterior drainage system if one exists or installed in such a manner that storm water will drain away from the house and not result in washing, erosion, or damage to the foundation of the house. If there is no drainage system present, splash blocks or leaders shall be present.

I. Chimney Standards

1. General Performance

- a. Any operable chimney must meet all applicable chimney requirements.
- b. When an existing chimney is found not fit for its intended application it shall be repaired, rebuilt, lined, relined, or replaced with a vent or chimney to conform to the applicable code.
- c. Inoperable and/or deteriorated chimneys, which pose a health/safety risk, shall be corrected or removed.
- d. All empty or cracked mortar joints, including those in interior areas, such as basements and attics shall be tuck-pointed.
- e. Solid fuel burning chimneys, for burning of wood or coal, shall be provided with spark arrestors (screens).

2. Flue Lining

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

3. Chimney Hood

- a. The chimney hood shall have a height above the vent of at least 25 percent of the narrowest dimension of the vent. Hoods shall also be free from spalling or rust.
- b. Minor spalling shall be repaired. If more than small portions are spalling, the hood shall be replaced. If a metal chimney hood has excessive rust, it shall be replaced.

J. Electrical

1. General

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

2. Wiring

- a. Existing wiring and equipment shall be in proper operating condition and pose no health or safety risk.
- b. All wiring in areas other than the basement, unused attic areas, and garages shall be run in walls, wire mold or in conduit.
- c. A new or old service shall be grounded to a ground rod.
- d. Circuit extensions made with flexible cord wiring in lieu of permanent wiring shall be eliminated.
- e. Copper wiring shall have proper connections to aluminum wiring. It is recommended that aluminum wiring be replaced with copper wiring when possible.

3. Receptacles

- a. All damaged or inoperable receptacles shall be replaced.
Broken cover plates shall be replaced.
- b. Replacement of an existing non-utility or non-appliance two-prong receptacle may be with a 15-ampere non-grounding type receptacle.
- c. New or existing grounding type receptacles must be grounded or meet the current requirements of the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®..
- d. Existing baseboard receptacles properly set are acceptable.
- e. Any equipment or appliances with grounded plugs shall have immediate access to a proper size grounded receptacle.

4. Lighting

- a. A permanently installed light fixture controlled by a wall switch is required in the kitchen, bathroom, basement, stairwells, and hallways.
- b. Light fixtures shall be installed properly and have a shield/globe installed.

κ. *Plumbing*

1. Water Distribution System

- a. Please ensure that anyone performing plumbing work meets the proper licensing requirements as required by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. or local jurisdictions.
- b. Dwelling units shall be served by an approved sanitary sewage disposal system.
- c. Leaking drain or supply lines, the presence of lead piping, failed polybutylene joints or pipes, low water pressure, or corroded or broken pipes shall be repaired or replaced. Any cross connections or siphonage between fixtures shall be corrected.
- d. There shall be a properly operating main shut-off valve on the house side of the

meter.

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

2. Drain, Waste, and Vent System

- a. Leaks; clogged, slow, or non-working drains; or odors and any cross connections or siphonage between fixtures shall be corrected. Supplies that are located below the overflow drain must be corrected.
- b. Horizontal drainage piping shall be installed in uniform alignment at uniform slopes.
- c. The size of drainage pipe shall not be reduced in the direction of flow.

3. Hot Water Supply System

- a. Each dwelling unit shall have a water heater located, equipped, and installed in accordance to the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.
- b. A discharge pipe, no less than the diameter of the relief valve inlet, shall be installed not less than six inches from the floor. The end of the discharge pipe shall not be threaded.

4. Fixtures and Faucets

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

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

- c. Bathtub>Showers. A rusted bathtub and/or shower unit or one that is chipped or has badly worn enamel, or not in good repair shall be corrected.
- d. Flush Water Closet. The water closet shall be in good repair and securely installed. All water closets, existing or newly installed, shall have a functioning shut-off valve.

L. HVAC Standards

1. Controls

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

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- a. Piping shall be properly supported, but not supported by other piping. A sediment trap shall be located as close as practical to the inlet of each combustion appliance (illuminating appliances, ranges, dryers, and outdoor grills need not be equipped). Shutoff valves shall be installed where required by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. and have easy access, be user friendly, and be protected from damage.
- b. Piping shall be supported with appropriate hangers for the size of pipe. Supports shall be at such an interval and strength to prevent or dampen excessive vibration. Pipe supports shall be installed so movement of the pipe being supported will not detach them.

3. Combustion Heat (Forced Air Systems only)

Basic Conditions

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

and the International Existing Building Code®.

Vents

General Conditions

- a. Vents shall be sized to properly exhaust all combustion products outdoors. Vents shall also consist of the appropriate vent type for the combustion appliance(s) being vented. Vents shall be free from damage or rust and be tightly connected.
- b. Vents shall be properly supported so that they are generally vertical and comply with the listed clearance to combustible materials of the vent.
- c. Direct vent sealed combustion; power venting, and other approved methods of venting are permitted if they are installed according to manufacturer's instructions.

Vent Termination

- a. Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code® govern.
- b. Vents must terminate vertically unless direct vent sealed combustion, power venting, or other approved methods of horizontal venting are used and installed according to manufacturer's instructions.

Vent Connectors

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

- b. Vent connectors shall be properly supported and have a minimum slope of $\frac{1}{4}$ inch per foot and comply with the listed clearance to combustible materials of the vent.

4. Electric

Heat

Observa

ble heat

source

- a. All heating elements shall be functional. Heating units shall also be in good condition. The heating system must be capable of heating all habitable rooms, bathrooms, and water closets to a temperature of at least 70° F for local design temperatures at a distance of 36 inches above floor level. Heating elements shall have good connections and no damaged or charred wires. Aluminum shall not be used as wiring unless specified by the manufacturer.
- b. Any heating element that does not adequately heat shall be checked to make sure the connections to the element are satisfactory and that the relay is not malfunctioning.

5. Cooling

- a. Central air conditioners shall be in good, working condition.
- b. Unit/Window and Packaged terminal air conditioners shall have a tight seal around the unit and be properly supported.
Unit/Window air conditioners shall also be properly grounded.
- c. If a heat pump is equipped with a reversing valve, it shall function properly.
- d. Bent fins on air conditioners should be combed to straighten them.
The condensate shall be properly drained so that moisture problems are not created. Fiberglass shall not be used as an air sealant around window/unit air conditioners. Both indoor and outdoor coils

should be clean. Suction lines should also be insulated to prevent possible moisture problems.

- e. A disconnecting means shall be installed in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

6. Distribution Systems

- a. The following conditions shall be followed:
 - 1. Duct systems shall be intact, supported properly, and well sealed.
 - 2. Air shall be allowed to flow freely from supply registers into return registers.
 - 3. When furnaces are converted from a gravity fed heating system to a forced air system the duct system should be reconfigured and properly sized so that the heating system functions properly.
 - 4. Duck tape shall not be used to seal or connect ducts.
- b. When possible, supply and return registers shall be located in the same room, except for bathrooms or kitchens. No returns should be located in bathrooms and kitchens. If supplies and returns cannot be in the same room, measures must be taken to allow for air to flow from supplies to a return even if doors are closed separating the rooms. Grills and louvers are two methods of allowing air to flow from room to room.

m. Ventilation

1. Minimum Ventilation Standards

- a. All habitable rooms shall be provided with natural or mechanical ventilation.
- b. Louvers, windows and doors shall be able to let air pass freely between the room and the outdoors.

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

Bathrooms

- a. Bathrooms that have a tub or shower shall be ventilated.
- b. Windows must have at least 1.5 square feet of area that air can pass through if mechanical ventilation is not available.
- c. Ventilated air shall be exhausted directly outside and not terminate in any other part of the building.
- d. Any ductwork passing through attics shall be insulated.

2. Clothes

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exhaust

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General

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- a. Dryer exhaust systems shall be independent of all other systems; shall convey the moisture to the outdoors and shall terminate on the outside of the building. Screens shall not be installed at the duct termination. Transition ducts shall not be concealed within construction.
- b. Exhaust ducts shall not be connected with sheet-metal screws or fastening means which extend into the duct.
- c. Exhaust ducts shall be equipped with a backdraft damper.
- d. Exhaust ducts shall be constructed according to Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International

Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®, having smooth interior surfaces with joints running in the direction of the airflow.

- e. Flexible transition ducts used to connect the dryer to the exhaust duct system shall be limited to single lengths, not to exceed eight feet in length, and shall be listed and labeled in accordance with UL 2158A.
- f. Exhaust duct terminations shall be in accordance with the dryer manufacturer's installation instructions.

Lint collector

- a. All ducts expelling lint shall be provided with a lint collector unless the dryer is already equipped with one.
- b. Lint collectors shall be installed according to manufacturer's instructions.

Exhaust duct size

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

Exhaust clearance

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

Length limitation

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

3. Range Hoods

- a. Range hoods for gas stoves that discharge to the outdoors must be through a single wall duct. The duct serving the hood shall be airtight and shall be equipped with a backdraft damper. Ducts serving range hoods shall be constructed of galvanized steel or stainless steel and not terminate in an attic or crawl space or areas inside the building.
- b. Variations can be made where installed in accordance with the manufacturer's installation instructions, and where mechanical or natural ventilation is otherwise provided

4. Overhead exhaust hoods

- a. Overhead exhaust hoods shall discharge to the outdoors and shall be equipped with a backdraft damper. Broiler units incorporating an integral exhaust system, and listed and labeled for use without an exhaust hood, need not be provided with an exhaust hood.
- b. Domestic open-top broiler units shall be provided with a metal exhaust hood, not less than 28 gauge, with a clearance of not less than 0.25 inch between the hood and the underside of combustible material or cabinets. A clearance of at least 24 inches shall be maintained between the cooking surface and the combustible material or cabinet. The hood shall be at least as wide as the broiler unit and shall extend over the entire unit and be centered over the unit

N. Fire Safety

1. Emergency Escape and Rescue Openings

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

2. Exits

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

3. Smoke Alarms

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

o. Hazardous Materials

1. Asbestos

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

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

p. Energy Efficiency

1. Exterior Walls

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

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

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

2. Attics/Ceilings

- a. Attic areas are governed by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2009 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.
- b. Insulation should be installed in accordance to manufacturer's specifications. All insulation in the attic should meet the appropriate fire safety codes. Thorough air sealing of the attic floor must be accomplished prior to addition of insulation.

3. Ductwork

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

4. Piping

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

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

5. Air Sealing

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

q. *Special Needs*

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

Appendix - Alternate/Local Data Sources

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

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

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

**STATE OF WISCONSIN
HOUSING TRUST FUND (HTF)
MINIMUM MULTI-FAMILY
HOUSING REHABILITATION
STANDARDS and NEW
CONSTRUCTION STANDARDS**

**Division of Energy, Housing,
and Community Resources
(DEHCR)**

101 E. Wilson Street
PO BOX 7970
MADISON, WI 53707
DOAHousingTrustFund@wisconsin.gov

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I. Preface

This document is intended to outline the requirements for building rehabilitation for all State of Wisconsin HTF funded multifamily housing projects. These standards, though a requirement specifically to the development entity in direct receipt of HTF funding, are written to provide guidance to all relevant members of a project development team.

These standards are not intended to reduce or exclude the requirements of any local or state building or housing codes, standards, or ordinances that may apply. In the event of any conflicting code(s), the more restrictive code(s) will apply. Housing rehabilitated with HTF must comply with Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2018 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. Chapter SPS 366 can be found at [Admin Code SPS 366](#) and <http://codes.iccsafe.org/I-Codes.html>

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

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

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

These standards assume that a knowledgeable development team will thoroughly inspect each building and unit to verify the presence and condition of all components, systems, and equipment. All components, systems, and equipment of a dwelling referenced in this document shall be in good working order and capable of being used for the purpose for which they were intended and/or designed. Components, systems and/or equipment that are not in good working order and condition shall be repaired or replaced. When it is necessary to replace items (systems, components, or equipment), the replacement items shall conform to these standards. These standards also assume that the development team will take into account any extraordinary circumstances of the occupants of the dwelling (e.g., physical disabilities) and reflect a means to address such circumstances in their inspection and in the preparation of a work write-up/project specifications for that dwelling.

All interior ceilings, walls, and floors shall not have any serious defects such as severe bulging or leaning, large holes, loose surface materials, severe buckling, missing components or other serious damage. The roof shall be structurally sound and weather resistant. All exterior walls (including foundation walls) shall not have any serious defects such as leaning, buckling, sagging, large holes, or defects that may result in the structure not being weather-resistant or

that may result in air infiltration or vermin infestation. The condition of all interior and exterior stairs, halls, porches, walkways, etc. shall not present a danger of tripping or falling. Painted or varnished surfaces shall be free of deteriorated paint.

If the development team determines that the specific individual standards of this document cannot be achieved on any single dwelling due to it being structurally impossible and/or cost prohibitive, the inspector shall document the specific item(s) as non-conforming with these standards. The inspector shall prepare, for HTF's consideration, a list of any and all non-conforming items along with their recommendation to waive, or not to waive, the individual non-conforming items. Any waiver of non-conforming items are at the sole discretion of HTF. Items necessary to meet HUD Uniform Physical Conditions Standards (UPCS)*¹ may not be waived.

Where there are discrepancies between state and/or local codes and the HTF rehabilitation standards the stricter standard shall prevail.

Upon project completion, units will be decent, safe, sanitary and in good repair and meet the standards in 24 CFR 5.703, The National Standards for the Physical Inspection of Real Estate (NSPIRE). The carbon monoxide detection requirement at 24 CFR 5.703(b)(2) and (d)(6) and the requirements at 24 CFR 5.705–5.713 do not apply to HTF-assisted projects. Properties not meeting NSPIRE standards will be required to correct deficiencies

Energy Star rated systems, components, equipment, fixtures and appliances are required.

1. Quality of Work

- A. **Quality of Work:** Developers shall ensure that all rehabilitation work is completed in a thorough, professional, and workmanlike manner, consistent with industry standards and the contractually approved plans, specifications, and any subsequent mutually agreed upon change orders during the construction process. Developers will employ best practice industry standards relating to quality assurance to verify all work completed. Any work that requires a license or certified professional under state or local law shall be performed by individuals or firms holding a valid and current license or certification in the State of Wisconsin.
- B. **Project Design Professionals:** Each project shall include formal contracts with licensed architectural and engineering professionals who are authorized to practice in the State of Wisconsin. These professionals will be responsible, to assure that the scope of work is done in accordance with the generally accepted practice in their discipline and designing the project to be in full compliance with all Federal, State and local codes. In addition, the architect and/or engineer will provide plans and contract specifications which stipulate quality standards, material choices and installation methods and standards.

2. Minimum Standards for Basic Equipment and Facilities²

A. Kitchens –

Every dwelling unit shall have a kitchen room or kitchenette equipped with the following:

¹ As of 10/1/2025 UPCS are expected to be replaced by the National Standard for the Physical Inspection of Real Estate (NSPIRE) and will apply.

² Any and all replacement, repair, or installation of equipment or building components must be completed per manufacturer specifications and meet compliance with federal, state, and/or local building requirements.

- **Kitchen Sink.** A kitchen sink, connected to both hot and cold safe water supply lines under pressure and to the sanitary sewer waste line. When replacing such components, water supply shut off valves shall be installed. Sinks shall be free of defects and in good working order
- **Oven and Stove or Range.** An oven and a stove or range (or microwave oven) connected to the source of fuel or power, in good working order and capable of supplying the service for which it is intended.
- **Refrigerator.** A refrigerator connected to the power supply, in good working order and capable of supplying the service for which it is intended.
- **Counter Space Area.** Every kitchen or kitchenette shall have an adequate storage area and adequate counter space. Countertops shall be free of defects and be constructed of a non-porous material. Porous surface materials shall be prepared and installed according to manufacturer's instructions.

Refrigerators and/or stoves that have broken or missing parts, deteriorated seals, missing hardware, leaking coolant or are inefficient or inoperable shall be repaired or replaced.

If mildew or mold is present, measures shall be taken to prevent future mold/mildew as well as address the current mold/mildew.

- B. **Toilet Room:** Every dwelling unit shall contain a room which is equipped with a flush toilet and a lavatory. The flush toilet shall be connected to the cold potable water supply, under pressure, and to the sanitary sewer system. The lavatory shall be connected to both a hot and cold safe water supply, under pressure, and connected to the sanitary sewer system. When replacing such components, water supply shut-off valves shall be installed. If mildew or mold is present, measures shall be taken to remove it and prevent future recurrence.
- C. **Bathing Facilities:** Every dwelling unit shall contain a bathtub and/or shower. These may be located in a room separate from the toilet and lavatory
 - The bathtub and/or shower unit shall be connected to both hot and cold potable water supply lines, under pressure, and shall be connected to the sanitary sewer system. Where feasible, shut off valves shall be installed on the water supply lines. When replaced, all faucets, shall be water balancing scald guard type faucets.
- D. **Privacy in Room(s) Containing Toilet and/or Bath:** Every toilet room and/or every bathroom (the room or rooms containing the bathtub and/or shower unit) shall provide privacy to users. Such rooms shall have doors equipped with a privacy lock or latch in good working order.
- E. **Hot Water Supply:** Every dwelling unit shall have supplied water-heating equipment (water heater and hot water supply lines) that is free of leaks, connected to the source of fuel or power, and is capable of heating water to be drawn for general usage.
 - **Prohibited Locations.** No gas water heaters shall be allowed in a confined space. No water heaters shall be allowed in the toilet rooms, bathrooms,

bedrooms, or sleeping rooms. No gas water heaters shall be allowed in a clothes closet.

- **Venting Requirements.** All gas water heaters shall be vented in a safe manner to a chimney or flue leading to the exterior of the dwelling. Unlined brick chimneys shall have a metal liner installed to meet manufacturer's venting requirements. If metal chimney venting cannot be added, a power vented water heater may be installed. Install according to manufacturer's specifications. All water heaters shall be equipped with a pressure/temperature relief valve possessing a full-sized (non-reduced) approved discharge pipe to within six (6) inches of the floor. The discharge pipe shall not be threaded at the discharge end.
- **Installation and Safety.** All water heaters shall be installed to manufacturer's installation specifications and in accordance to the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.
- **Standards.** Replacement water heaters shall meet Energy Star requirements at the time of installation.
- **Tankless Water Heaters.** Where feasible, tankless water heaters shall be installed in accordance with manufacturer guidelines and sized to provide adequate hot water supply to all fixtures. Gas supply lines and/or electrical capacity shall be evaluated before installing tankless water heaters. Before installing, careful consideration should be made regarding supply and water temperature.

3. Stair Standards

All stair and stairways shall be in good repair and not pose a tripping hazard. Open risers are not permitted. Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces. If replacing existing stairs, stairs will need to conform as close as possible to new construction standards. All newly constructed stairs (interior and exterior stairways) shall comply with the following requirements and local and state code requirements.

- A. All stairs and steps shall have a riser height of not more than eight inches (8") and a tread depth of not less than nine inches (9"). All newly constructed stairs, not replacement stairs, shall have a riser height of not more than seven and three quarters (7 3/4"), a tread depth of not less than ten inches (10") and a clear width not less than 36 inches (36"). Risers and treads cannot be different in size by more than 3/8 of an inch from the top to the bottom of the stairs
- B. **Handrail Requirements:** All stairways and steps of four (4) or more risers shall have at least one handrail. All stairways and steps which are five (5) feet or more in width shall have a handrail on each side. Handrails shall meet the following standards.
 - Be installed not less than thirty-four inches (34") nor more than thirty-eight inches (38"), measured plumb, above the nosing of the stair treads.
 - Handrails adjacent to a wall shall have a space of not less than one and one-

half inches (1 1/2") between the wall and the handrail.

- All handrails shall be turned back into the wall on railing ends. The size of a round railing shall be a minimum of 1.25 inches, but not more than 2 inches.
- Railings shall be continuous from the top riser to the bottom riser.
- Porches, balconies, decks, or raised floor surfaces, including stairway riser and/or landing, located more than thirty (30) inches above the floor or the grade, shall be protected by guardrails in accordance with Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

4. Fire Safety

A. Emergency Escape and Rescue Openings

- Emergency escape and rescue openings shall comply with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

B. Exits

- Exits shall comply with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.
- Every sleeping room shall have two (2) independent and unobstructed means of egress. This is normally achieved through an entrance door and an egress window. Windows shall be of legal egress size when required by code.

C. Automatic Sprinkler Systems

Automatic sprinkler systems shall meet the requirements of Wisconsin Administrative Code Chapter SPS 362.0903 and the International Building Code Requirements Chapter 9 Section 903.

D. Smoke Alarms

- All smoke detectors shall be dual sensor detectors. They shall be hard-wired with battery back-up and interconnected with all other hard wired alarms. or have a sealed, tamper-proof 10 year battery.
- Individual dwelling units shall be provided with smoke alarms as required by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

- All smoke detectors shall be installed according to the manufacturer's installation instructions. Smoke detectors shall be located as follows.
- **Within the dwelling unit:**
 - a. On the ceiling or wall outside of each separate sleeping area in the immediate vicinity of bedrooms.
 - b. In each room used for sleeping purposes, and in each story within a dwelling unit, including basements but not including crawl spaces and uninhabitable attics. In dwellings or dwelling units with split levels and without an intervening door between the adjacent levels, a smoke alarm installed on the upper level shall suffice for the adjacent lower level provided that the lower level is less than one full story below the upper level.
 - c. Within 21 feet of any door to a bedroom measured along a path of travel; and
 - d. Where a smoke detector installed outside a bedroom is separated from an adjacent living area by a door, a smoke detector shall also be installed on the living area side of the door.
 - e. If the unit is occupied by any hearing-impaired person, the smoke detectors shall have an alarm system designed for hearing-impaired persons
- **Within the common areas inside:**
 - a. The inside area shall include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each level of the property.

5. Carbon Monoxide Detectors

Where a fuel burning appliance exists, a carbon monoxide detector/alarm shall be installed. Carbon monoxide detectors shall be installed per the manufacturer's instructions and meet the requirements of Wisconsin Administrative Code SPS 362.0915.

6. Minimum Standards for Ventilation

- A. In general, sufficient ventilation shall be present to ensure adequate air circulation in the dwelling.
- B. Bathrooms, including toilet rooms, shall be provided with an exhaust fan. If it is being installed or replaced, it shall be sized accordingly to the room size, switched with the primary bath light and be Energy Star qualified. Fans shall have insulated ducting vented to the exterior. A fan needs to be installed if there is no window or a non-operable window is present. Windows shall have at least 1.5 square feet of area that air can pass through if mechanical ventilation is not available.
- C. All plumbing stacks shall continue through the roof, wall, or gable and not terminate in the attic. Plumbing stacks shall be in good repair.

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

E. Clothes Dryers

- Dryer exhaust systems shall be independent of all other systems; shall convey the moisture to the outdoors and shall terminate on the outside of the building. Screens shall not be installed at the duct termination. Transition ducts shall not be concealed within construction.
- Exhaust ducts shall not be connected with sheet-metal screws or fastening means which extend into the duct.
- Exhaust ducts shall be equipped with a backdraft damper.
- Exhaust ducts shall be constructed according to Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®, having smooth interior surfaces with joints running in the direction of the airflow.
- Flexible transition ducts used to connect the dryer to the exhaust duct system shall be limited to single lengths, not to exceed eight feet in length, and shall be listed and labeled in accordance with UL 2158A.
- Exhaust duct terminations shall be in accordance with the dryer manufacturer's installation instructions.
- All ducts expelling lint shall be provided with a lint collector unless the dryer is already equipped with one.

7. Minimum Standards for Electrical Service

Standards exist in Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®

A. Minimum Electrical Service

- Every dwelling unit, at a minimum, shall have a 100-ampere breaker controlled electrical panel. All electrical work shall be in compliance with adopted State electrical code requirements. The panel, service mast, etc. shall also be installed to local utility company requirements.

B. Wiring

- Existing wiring and equipment shall be in proper operating condition and pose no health or safety risk.
- All wiring in areas other than the basement, unused attic areas, and garages shall be run in walls, wire mold or in conduit.

- A new or old service shall be grounded to a ground rod.
- Circuit extensions made with flexible cord wiring in lieu of permanent wiring shall be eliminated.
- Copper wiring shall have proper connections to aluminum wiring. It is recommended that aluminum wiring be replaced with copper wiring when possible.
- All accessible knob and tube, unsafe, and/or illegal wiring shall be removed and replaced with type NM cable (Romex) or as required by code.

C. Receptacles

Every habitable room within the dwelling shall contain at least two (2) separate duplex, wall-type electrical outlets. Placement of such outlets shall be on separate walls. All newly installed receptacles shall be grounded duplex receptacles, tamper resistant, arch fault protected or GFCI protected as required by code. All new or existing receptacles shall be grounded duplex receptacles, tamper resistant, or meet the current requirements of the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®

- All electrical outlets used in bathrooms and toilet rooms, all outlets within six foot (6'-0") of a water source (excluding designated simplex equipment circuits for clothes washing machines and sump pumps), outlets located on open porches or breezeways, exterior outlets, outlets located in garages and in non-habitable basements, except those electrical outlets that are dedicated appliance outlets, all kitchen receptacles serving the countertop area shall be ground fault circuit interrupter protected (GFCI). All exterior receptacles shall be covered by a receptacle cover that when a cord is plugged in, the GFCI outlet will stay covered and protected.
- All broken, damaged or nonfunctioning switches or outlets shall be replaced. All fixtures and wiring shall be adequately installed to ensure safety from fire so far as visible components are observed. All missing or broken switch and outlet covers (including junction boxes) shall be replaced. Each receptacle or switch located on an exterior wall shall have a foam seal placed under the cover.
- Any equipment or appliances with grounded plugs shall have immediate access to a proper size grounded receptacle.

D. Lighting:

- A permanently installed light fixture controlled by a wall switch is required in the kitchen, bathroom, basement, stairwells, and hallways. Energy efficient fixtures that meet energy star ratings and compact florescent bulb equivalent

or better shall be installed in all new fixture installations. Light fixtures shall be installed properly and have a shield/globe installed.

- All stairwells shall have at least one light fixture controlled by a remote wall switch at the top and bottom of the stairs.
- Porcelain type fixtures with pull chains are acceptable for use in basements (except for the one controlled by a remote wall switch) cellars, and attics.
- All pendant type lighting fixtures that are supported only by the electrical supply wire shall be removed or replaced. If replaced, replace with Energy Star rated fixtures equipped with CFL or LED bulbs.

8. Minimum Standards for Heating and Cooling Systems

All units shall be heated and air conditioned. The design of the system shall be such to maintain a consistent temperature in all habitable spaces evenly throughout the day. Heating, ventilating, and air-conditioning systems shall be designed and installed according to the requirements of the local or state building code. If no building code is adopted within the jurisdiction or state, the most current edition of the International Mechanical Code shall apply. They shall also comply with the efficient utilization of energy in accordance with the latest edition of the International Energy Conservation Code.

A. Cooling System:

- Non-working or improperly functioning central air conditioning systems shall be repaired or replaced as part of the rehabilitation work. The installation of a central air conditioning system, where it currently does not exist, is permissible where feasible and practical.
- If a heat pump is equipped with a reversing valve, it shall function properly.
- A disconnecting means shall be installed in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.

B. Heating System:

- All existing heating systems, including but not limited to, chimneys and flues, cut-off valves and switches, limit controls, heat exchangers, burners, combustion and ventilation air, relief valves, drip legs and air, hot water, or steam delivery components (ducts, piping, etc.) that are not being replaced, shall be inspected to be in a safe and proper functioning condition at the time of inspection, by means of written project file documentation.
- Every heating system burning liquid or gaseous fuels shall be vented in a safe manner to a chimney or flue leading to the exterior of the dwelling. The heating system chimney and/or flue shall be of such design to assure proper draft and shall be adequately supported.

- Each gas and oil combustion system shall have a master switch that serves as an emergency shutoff for the HVAC burner. The switch shall be easily accessible by the client in case an emergency shutoff is necessary. The switch shall also be in the line of sight of the appliances it controls.
- No heating system source burning liquid or gaseous fuels shall be located in any habitable room or bathroom, including any toilet room.
- Every fuel burning appliance (liquid or gaseous fuels) shall have adequate combustion air and ventilation air.
- Every heat duct, steam pipe and hot water pipe shall be free of leaks and shall function such that an adequate amount of heat is delivered where intended. All accessible duct joints shall be sealed with mastic or any other acceptable product. Newly installed ductwork shall also be sealed. All accessible steam piping and hot water piping shall be installed with an approved material.
- Every seal between any of the sections of the heating source(s) shall be air-tight so that noxious gases and fumes will not escape into the dwelling.
- No space heater shall be of a portable type.
- Minimum requirements for forced air furnaces, when installed, will be no less than a 92% AFUE. A digital programmable thermostat shall be installed. Condensate lines will drain to a floor drain or have a condensate pump installed and piped to discharge. All furnace ductwork shall be equipped with an air filter clean out location that has a tight fitting cover installed over it.
- All boilers, when replaced, will have an "A" rating and be no less than 90% AFUE rating. All combustion air will be from the exterior of the house. The addition of zone valves may be useful to reduce energy cost. Heat lines shall be insulated with approved material. Programmable thermostats will be installed.
- Heat Pumps, if added or replaced, shall be rated at 8 HSPF or greater with a 13 SEER rating or higher.

9. Energy Conservation

All structures shall comply with certain energy conservation measures. These measures include, but are not necessarily limited to the following:

A. Exterior Walls

- Walls should be insulated in accordance with the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®. when any of

the following activities occur:

- a. New walls,
 - b. Walls that have become exposed during rehabilitation, and
 - c. If the exterior covering is removed
- When new windows are to be installed, windows shall be current Energy Star rated for northern climates. All rope weight openings will be insulated and all new windows will have the window jamb sealed. Where SHPO requirements will restrict the installation of vinyl windows, the specifications will be written to come as close as possible to achieving Energy Star requirements.
 - All heat ducts and hot water or steam heat distribution piping shall be insulated or otherwise protected from heat loss where such ducts or piping runs are located in unheated spaces. Similarly, distribution piping for general use hot water shall also be protected from heat loss where such piping is located in unheated spaces. All water distribution piping shall be protected from freezing. All supply and return air ducts and plenums shall be insulated according to the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®.
 - Attic areas are governed by the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code®
 - Attic access passageways (scuttle holes) shall be no less than 22" by 30" or the size of original construction. If it is impossible to conform to this standard, the largest attic access hole possible will be installed. Attic access covers are required to be insulated.
 - Insulation should be installed in accordance to manufacturer's specifications. All insulation in the attic should meet the appropriate fire safety codes. Thorough air sealing of the attic floor shall be accomplished prior to addition of insulation
 - Exterior joints, seams or penetrations in the building envelope, that are sources of air leakage, shall be sealed.

10. Minimum Standards for the Interior of Structures

- A. **Interior Walls, Floors, Ceilings, Doors, and Windows:** All interior ceilings, walls, and floors shall not have any serious defects such as severe bulging or leaning, large holes, loose

surface materials, severe buckling, missing components or other serious damage. The condition of all interior stairs, halls, walls, floors, doors shall not present a danger of tripping or falling.

- All interior walls, floors, ceilings, doors and windows shall be easily cleanable and durable. Every bathroom and/or toilet room, kitchen or kitchenette, and utility room floor surface shall be constructed such that they are impervious to water and can easily be kept in a clean and sanitary condition.
- Carpet shall not be installed in high moisture areas including: entryways, bathrooms, kitchens, and laundry rooms/closets. All carpet shall be CRI Green Label Plus and hard surface flooring shall be SCS Floorscore certified. (Applies to new flooring only.)
- All interior doors shall be capable of affording the privacy for which they are intended.
- No dwelling containing two or more bedrooms shall have a room arrangement that access to a bathroom, toilet room, or a bedroom can be achieved only by going through another bathroom, toilet room, or another bedroom.
- All paints, stains, varnishes, lacquers and other finishes used in the rehabilitated dwelling shall be low or no VOC paint finishes and installed as required by the manufacturer. The use of lead based paint is prohibited.
- All new wood shelving, cabinets and countertops to be formaldehyde free or sealed board products.

11. Minimum Standards for the Exterior of Structures

A. Foundations, Exterior Walls, Roofs, Flashing ,Soffits and Fascia:

- Every foundation, exterior wall, roof, soffit and fascia shall be made weather resistant. Products for exterior walls, roofs, soffits, and fascia shall be installed in accordance with the manufacturer's guidelines and shall comply with the provisions of the Wisconsin Administrative Code Chapter SPS 366 for Existing Buildings, which incorporates the 2021 edition of the International Building Code®, the International Energy Conservation Code®, the International Mechanical Code®, the International Fuel Gas Code® and the International Existing Building Code, and per manufacturer's requirements.
- The condition of all exterior stairs, halls, porches, walkways, etc., shall not present a danger of tripping or falling.
- All exterior walls (including foundation walls) shall not have any serious defects such as leaning, buckling, sagging, large holes, or defects that may result in the structure not being weather-resistant or that may result in air infiltration or vermin infestation.

- A minimum of a 30 year warranty asphalt or composite shingle, 29 gauge metal roof with a 50 year finish/fade warranty or a 60 mil rubberized roof with a 30 year warranty for flat roofs shall be installed.
- Shingles that are missing, have excessive curling, cupping, deterioration and are installed on a roof slope below code requirements shall be removed and replaced with an approved covering.
- Flat roofs that are punctured, cracked, blistered, wrinkled, or otherwise distressed areas shall be corrected.
- Flashing shall be in good repair and used wherever the roof abuts a wall or vent, around other extensions through the roof, and around masonry chimneys.

B. Chimney Standards

- Any operable chimney shall meet all applicable chimney requirements.
- When an existing chimney is found not fit for its intended application it shall be repaired, rebuilt, lined, relined, or replaced with a vent or chimney to conform to the applicable code.
- Inoperable and/or deteriorated chimneys, which pose a health/safety risk, shall be corrected or removed.
- All empty or cracked mortar joints, including those in interior areas, such as basements and attics, shall be tuck-pointed.
- Solid fuel burning chimneys, for burning of wood or coal, shall be provided with spark arrestors (screens).
- All operable chimneys shall have flue liners in good condition.
- The chimney hood shall have a height above the vent of at least 25 percent of the narrowest dimension of the vent. Hoods shall also be free from spalling or rust.
- Minor spalling shall be repaired. If more than small portions are spalling, the hood shall be replaced. If a metal chimney hood has excessive rust, it shall be replaced.

C. Gutters & Downspouts

- Missing, sagging, or deteriorated gutters shall be repaired or replaced.
- Downspouts shall be color coordinated with gutters and shall be proportional in size to the drainage needs of the roof.
- Gutters shall be supported as per the manufacturer's specifications with spikes and ferrules, wrap-around straphangers, or with hidden hangers.
- Downspouts shall be securely attached to the structure and connected to an exterior drainage system if one exists or installed in such a manner that storm water will drain away from the house and not result in washing, erosion, or damage to the foundation of the house. If there is no drainage system present, splash blocks or

leaders shall be present.

D. Drainage:

- All rainwater shall be conveyed and drained away from every roof so as not to cause wetness or dampness in the structure. No roof drainage systems shall be connected to a sanitary sewer, or directly to a storm sewer system.
- The ground around the dwelling shall be sloped away from foundation walls with a minimum of 2% slope for hard surface adjoining the foundation and no less than 5% for landscaped surfaces to divert water away from the structure.
- The design of private internal roadways and sidewalks shall comply with the local jurisdiction's design requirements. Parking areas shall be paved and graded for proper drainage.

E. Windows, Exterior Doors and Basement Entries (Including Cellar Hatchways):

- Windows shall be of legal egress size when required by code
- Every window, exterior door, basement entry and cellar hatchway shall be tight fitting within their frames, be rodent-proof, insect-proof and be weatherproof such that water and surface drainage is prevented from entering the dwelling.
- In addition, the following requirements shall also be met:
 - a. All exterior doors and windows shall be equipped with security locks. Deadbolts are required and shall be equipped with a 1 inch (1") throw into a reinforced jamb.
 - b. Every window sash shall be fully equipped with glass windowpanes which are without cracks or holes. Every window sash to be replaced shall use Energy Star rated for northern climate windows unless the existing windows have insulated glass. Stained or leaded glass found to be historically significant may be protected by a fixed low-E glass storm window. Every window sash shall fit tightly within its frame and be secured in a manner consistent with the window design. All window jambs will be sealed. All rope weight openings shall be insulated before installing the new window.
 - c. Storm doors, when installed, shall also be equipped with a self- closing device.
 - d. Every exterior door, when closed, shall fit properly within its frame and shall have door hinges and security locks or latches. All exterior doors will be no less than metal clad insulated (foam filled) or composite doors in a metal clad or composite frame. Unit entry doors without windows shall have 180 degree view peephole installed. All jambs and thresholds will be sealed.

- e. Every exterior door shall be not less than two foot-four inches (2'- 4") in width and not less than six foot-six inches (6'6") in height. Existing door sizes will be grandfathered, but an attempt shall be made to have at least one exterior door that is not less than 36 inches wide and no less than 6'-8" high.
- f. Fire rated doors shall be in operable condition.

12. Minimum Space, Use, and Location Requirements.

- A. No cellar space shall be converted to habitable space.
- B. **Habitable Basement Space:** No basement space shall be used as habitable space unless all habitable space requirements are met and all of the following requirements are met:
 - The floor and walls are waterproof or damp proof construction.
 - Such habitable space has a hard surfaced floor of concrete or masonry.
 - Such space shall have a minimum of two exits. In addition to the stairs, this would normally consist of one egress window.

13. Minimum Standards for Plumbing Systems

All dwelling plumbing systems shall be capable of safely and adequately providing a water supply and wastewater disposal for all plumbing fixtures. Every dwelling plumbing system shall comply with the following requirements.

- All existing plumbing systems and plumbing system components shall be free of leaks. When repairing or adding to such systems, any type of pipe allowed by the State plumbing code shall be allowed.
- All plumbing system piping shall be of adequate size to deliver water to plumbing fixtures and to convey wastewater from plumbing fixtures (including proper slope of wastewater piping) as designed by the fixture manufacturer).
- All plumbing fixtures shall be in good condition, free of cracks and defects, and capable of being used for the purpose in which they were intended.
- The plumbing system shall be vented in a manner that allows the wastewater system to function at atmospheric pressure and prevents the siphoning of water from fixtures. Venting by mechanical vents is accepted as an alternative to exterior atmospheric venting.
- Leaks; clogged, slow, or non-working drains; or odors and any cross connections or siphonage between fixtures shall be corrected. Supply lines that are located

below the overflow drain shall be corrected.

- Horizontal drainage piping shall be installed in uniform alignment at uniform slopes.
- The size of drainage pipe shall not be reduced in the direction of flow
- All fixtures that discharge wastewater shall contain, or be discharged through, a trap that prevents the entry of sewer gas into the dwelling.
- All plumbing system piping and fixtures shall be installed in a manner that prevents the system, or any component of the system, from freezing.
- All plumbing fixtures and water connections shall be installed in such a way as to prevent the backflow of water from the system into the plumbing system's water source.
- Valves shall be installed with the valve in the upright position. When replacing valves, the use of a full port ball-valve shall be encouraged.
- When replacement of fixtures (faucets, toilets, urinals, showerheads) is required they shall meet EPA Water Sense Requirements and be labeled as such.

14. Minimum Standards for Safe Water Supply

- A. Every dwelling shall be connected to an approved (by the jurisdiction having authority) safe water source.
 - All safe (potable) water fixtures and equipment shall be installed in such a manner as to make it impossible for used, unclean, polluted or contaminated water, mixtures or substances to enter any portion of the safe water system piping. All equipment and fixtures shall be installed with air gaps (traps) to prevent back siphonage. All outlets with hose threads (except those serving a clothes washing machine) shall have a vacuum breaker for use with the application. Any plumbing equipment or fixtures that allow, or appear to allow, the previous conditions, or are otherwise deemed to be unhealthy, unsanitary, or unsafe shall be replaced. No water piping supplied by a private water supply system shall be connected to any other source of water supply without the approval of the jurisdiction having authority over the installation.

15. Minimum Standards for Connection to Sanitary Sewer

Every dwelling shall be connected to an approved (by the jurisdiction having authority) sanitary sewer system.

16. Asbestos

- A. Housing assisted with **HTF** funds is subject to the regulations at 40 CFR Part 61 and the Occupational Safety and Health Administration (OSHA) under regulations delineated in 29CFR 1926.1101, The Wisconsin Department of Natural Resources (DNR) enforces the control of asbestos emissions through chapter NR447 Wisconsin Administrative Code.

- B. The Wisconsin Department of Health Services (DHS) requires and enforces training and certification of individuals involved in asbestos-related activities through chapter DHS 159, Wisconsin Administrative Code.

17. Lead-Based Paint

The use of lead based paint is prohibited. Housing assisted with HTF funds is subject to the lead-based paint requirements in Title X of the Housing and Community Development Act of 1992, as amended, Section 1012 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X Subpart J), [DHS 163](#) Wisconsin Administrative Code, and 24 CFR 35. Applicants, developers, owners, and builders of any project requiring the rehabilitation or adaptive reuse of structures built prior to 1978 shall read, fully understand, and comply with 24 CFR Part 35, subparts A, B, J, K, and R.

18. Radon Systems

- A. When radon testing determines indoor air radon levels are at or above 4 pCi/L or the scientific data review determines the project site is located in an area that documents radon levels above 4 pCi/L the Environmental Review Record shall include a mitigation plan.
- B. The mitigation plan shall identify the radon level; consider the risk to occupants' health; describe the radon reduction system that will be installed; whenever possible, establish an ongoing maintenance plan to ensure the system is operating as intended; establish a reasonable timeframe for implementation (i.e., integrate radon mitigation activities into an annual plan); and require post-installation testing.

19. Accessibility

Housing assisted with HTF funds shall meet the accessibility requirements of 24 CFR Part 8, which implements Section 504 of the Rehabilitation Act of 1973, and Titles II and III of the Americans with Disabilities Act, implemented at 28 CFR Parts 35 and 36, as applicable. "Covered multifamily dwellings", as defined at 24 CFR Part 100.201, shall also meet the design and construction requirements at 24 CFR Part 100.205, which implements the Fair Housing Act.

20. National Standards for the Physical Inspection of Real Estate (NSPIRE).

Housing assisted with HTF funds and which are placed in service shall follow property standards which include all inspectable items and inspectable areas specified by the US Department of Housing and Urban Development (HUD) based on the HUD physical inspection procedures, known as NSPIRE. Inspectable items and observable deficiencies can be found at the end of this document or by using the link below. These standards will be updated periodically as required by HUD.

[Use link to our website Need to update with NSPIRE.](#)

Owners of HTF-assisted property shall maintain such housing in a manner that meets the physical condition standards set forth in this section in order to be considered decent, safe, sanitary, and in good repair. These standards address the major areas of the HTF-assisted housing: the site; the building exterior; the building systems; the common areas; and the dwelling units. Inspectable items are designated with a level of deficiency at which they shall be addressed. Life threatening deficiencies shall be addressed immediately and . Moderate and severe deficiencies shall be included in the proposed rehab. Low level deficiencies items can be addressed as part of the proposed rehabilitation or a reserve fund shall be established for replacement at a future date

Compliance with state and local codes: These physical condition standards do not supersede or preempt State and local codes for building and maintenance with which HTF-assisted housing shall comply. HTF-assisted housing shall continue to adhere to those codes.

DEHCR is responsible for conducting physical inspections of HTF-assisted housing to determine compliance with these standards and will conduct such inspections every one to three years or per its monitoring plan.

21. Disaster Mitigation

Where relevant, housing assisted with HTF funds and which involve rehabilitation or adaptive reuse be improved to mitigate the impact of potential disasters (e.g., earthquake, flooding, wildfires) in accordance with state and local codes, ordinances, and requirements.

22. Capital Needs Assessment

- A. Housing assisted with HTF funds which involves rehabilitation or adaptive reuse shall commission a Capital Needs Assessment (CNA).
- B. The CNA shall be completed by a competent, independent third party acceptable to HTF, such as a licensed architect or engineer, as well as an interview with available on-site property management and maintenance personnel to inquire about past repairs and improvements, pending repairs, and existing or chronic physical deficiencies.
- C. The assessment will include a site visit and a physical inspection of the interior and exterior of all units and structures. The assessment will consider the presence of environmental hazards such as asbestos, lead paint and mold on the site.
- D. The assessment will include an opinion as to the proposed budget for recommended improvements and should identify critical building systems or components that have reached or exceeded their expected useful lives. If the remaining useful life of any component is less than 30 years of the expected useful life, immediate rehabilitation will be required unless capitalized. If there remaining useful life of a component is less than the term of the HTF financing program, the application package shall provide for a practical way to finance the future replacement of the component.
- E. The assessment will examine and analyze the following:

- Site, including topography, drainage, pavement, curbing, sidewalks, parking, landscaping, amenities, water, sewer, storm drainage, and gas and electric utilities and lines;
- Structural systems, both substructure and superstructure, including exterior walls and balconies, exterior doors and windows, roofing system, and drainage;
- Interiors, including unit and common area finishes (carpeting, tile, plaster walls, paint condition, etc.), unit kitchen finishes, cabinets and appliances, unit bathroom finishes and fixtures, and common area lobbies and corridors; and
- Mechanical systems, including plumbing and domestic hot water; HVAC, electrical, lighting fixtures, fire protection, and elevators.

F. Applicants are advised to also consider the requirements of other funding sources, such as USDA Rural Development and LIHTC when ordering a CNA.

MINIMUM NEW CONSTRUCTION STANDARDS

The construction standards in this section shall apply to new construction projects. A project that involves reconstruction or adaptive reuse is considered new construction for the purposes of these standards.

New construction projects shall comply with:

- A. All applicable state and local residential and building codes, or in the absence of such codes, the International Residential Code, or International Building Code of the International Code Council.
- B. An Environmental review is required to ensure that in addition to federal requirements properties receiving HTF resources shall comply with the State's Environmental Barriers Act, the Wisconsin Accessibility Code, state statutes, local zoning requirements, and all state and local building codes, including the standards for multifamily dwellings established in Administrative Code sections SPS 361-365
- C. Housing assisted with HTF funds shall meet the accessibility requirements of 24 CFR Part 8, which implements Section 504 of the Rehabilitation Act of 1973, and Titles II and III of the Americans with Disabilities Act, implemented at 28 CFR Parts 35 and 36, as applicable. "Covered multifamily dwellings", as defined at 24 CFR Part 100.201, shall also meet the design and construction requirements at 24 CFR Part 100.205, which implements the Fair Housing Act, Minimum standards include but are not limited to
 - Lever-style handles on all interior doors;
 - Bath/kitchen faucets being replaced or initially installed shall be single-lever type;
 - Non-skid tub/shower pattern covering 75% of tub/shower floor;
 - All walls within 36" of toilet and in tub/shower area shall have 3/4" plywood behind drywall to provide sufficient support for grab bars or other assist devices;
 - Bathtub/shower stalls with offset controls;
 - Low-profile thresholds – 1/4" maximum vertical height or 1/2" maximum beveled at 1:2 are required between ALL interior common areas and in all dwelling unit openings when floor transition height differs
- D. **Energy efficiency requirements pursuant to section 109 of the Cranston Gonzalez National Affordable Housing Act (42 U.S.C 12709).**
 - For HTF-assisted single family homes and multifamily low-rise buildings (up to 3 stories) 2021 IECC standards.
 - For HTF-assisted multifamily housing with 4 or more stories ASHRAE 90.1-2019 as the minimum energy standards.

E. Broadband installation requirement.

- HUD defines broadband infrastructure as “cables, fiber optics, wiring, or other permanent (integral to the structure) infrastructure—including wireless infrastructure—as long as the installation results in broadband infrastructure in each dwelling unit meeting the Federal Communications Commission’s (FCC’s) definition in effect at the time the pre-construction estimates are generated and meets any State or local building codes that may apply to the installation of broadband infrastructure.
- This rule only requires that the broadband infrastructure provided be able to receive high-speed Internet that is “accessible” in each unit. It does not require those recipients of funding undertaking new construction or substantial rehabilitation to provide broadband service to current or future residents even if residents pay for such service. Furthermore, the definition of broadband infrastructure in the rule includes coaxial cable television (TV) wiring that supports cable modem access or even permanent infrastructure that would provide broadband speeds to dwelling units wirelessly.
- HTF funds may not be used to pay for furniture or equipment for a computer room, even as part of a multifamily assisted rental property.
- Requirement applies to multifamily projects with more than four rental units.

F. Disaster Mitigation

Where relevant, the housing shall be constructed to mitigate the impact of potential disasters (e.g., earthquakes, hurricanes, flooding, and wildfires), in accordance with State and local codes, ordinances, or other State and local requirements, or such other requirements as HUD may establish.

NSPIRE INSPECTION CHECKLIST

PHA:	Address of Unit:
Family Identifier:	Owner:
Any children under 6 reside or expected to reside in the unit? (Y/N):	Owner Contact Information:
Inspector:	Housing Type:
Date of Inspection:	Year Constructed:
Type of Inspection:	Number of Bedrooms:

Summary Decision on Unit (Pass/Fail):

Health & Safety Designation	Correction Timeframe (P/F)
LT	Life-Threatening - 24 Hours (Fail)
S	Severe - 30 Days (Fail)
M	Moderate - 30 Days (Fail)
L	Low - N/A (Pass)

*Affirmative Habitability Requirement per 24 CFR 5.703(d) and NSPIRE Final Rule

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Address and Signage	Address, signage, or building identification codes are broken, illegible, or not visible.			M ☐	
Bathtub and Shower	Only 1 bathtub or shower is present and it is inoperable or does not drain.	S ☐	L ☐		
	A bathtub or shower is inoperable or does not drain and at least 1 bathtub or shower is present elsewhere that is operational.	M ☐	L ☐		
	Bathtub component or shower component is damaged, inoperable, or missing such that it may limit the resident's ability to maintain personal hygiene.	M ☐	L ☐		
	Bathtub component or shower component is damaged, inoperable, or missing and it does not limit the resident's ability to maintain personal hygiene.	L ☐			
	Bathtub or shower cannot be used in private.*	*M ☐	M ☐		
Cabinet and Storage	Food storage space is not present.*	*M ☐			
	Storage component is damaged, inoperable, or missing.	M ☐	L ☐		
Call-For-Aid System	System is blocked, or pull cord is higher than 6 inches off the floor.	LT ☐	LT ☐		
	System does not function properly.	LT ☐	LT ☐		
Carbon Monoxide	Carbon monoxide alarm is missing, not installed, or not installed in a proper location.*	LT ☐			
	Carbon monoxide alarm is obstructed.	LT ☐	LT ☐		
	Carbon monoxide alarm does not produce an audio or visual alarm when tested.	LT ☐	LT ☐		
Ceiling	Ceiling has an unstable surface.	M ☐	M ☐		
	Ceiling has a hole.	M ☐	M ☐		
	Ceiling component(s) is not functionally adequate.	S ☐	S ☐		
Chimney	A visually accessible chimney, flue, or firebox connected to a fireplace or wood-burning appliance is incomplete or damaged such that it may not safely contain fire and convey smoke and combustion gases to the exterior.	LT ☐	LT ☐	LT ☐	
	Chimney exhibits signs of structural failure.			LT ☐	

NSPIRE INSPECTION CHECKLIST						
PHA:				Address of Unit:		
Family Identifier:				Owner:		
Any children under 6 reside or expected to reside in the unit? (Y/N):				Owner Contact Information:		
Inspector:				Housing Type:		
Date of Inspection:				Year Constructed:		
Type of Inspection:				Number of Bedrooms:		
Summary Decision on Unit (Pass/Fail):				Health & Safety Designation		Correction Timeframe (P/F)
				LT		Life-Threatening - 24 Hours (Fail)
				S		Severe - 30 Days (Fail)
				M		Moderate - 30 Days (Fail)
*Affirmative Habitability Requirement per 24 CFR 5.703(d) and NSPIRE Final Rule				L		Low – 60 Days (Fail)
Mark all that apply:						
Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments	
Address and Signage	Address, signage, or building identification codes are broken, illegible, or not visible.			M ☐		
Bathtub and Shower	Only 1 bathtub or shower is present and it is inoperable or does not drain.	S ☐	L ☐			
	A bathtub or shower is inoperable or does not drain and at least 1 bathtub or shower is present elsewhere that is operational.	M ☐	L ☐			
	Bathtub component or shower component is damaged, inoperable, or missing such that it may limit the resident's ability to maintain personal hygiene.	M ☐	L ☐			
	Bathtub component or shower component is damaged, inoperable, or missing and it does not limit the resident's ability to maintain personal hygiene.	L ☐				
	Bathtub or shower cannot be used in private.*	*M ☐	M ☐			
Cabinet and Storage	Food storage space is not present.*	*M ☐				
	Storage component is damaged, inoperable, or missing.	M ☐	L ☐			
Call-For-Aid System	System is blocked, or pull cord is higher than 6 inches off the floor.	LT ☐	LT ☐			
	System does not function properly.	LT ☐	LT ☐			
Carbon Monoxide	Carbon monoxide alarm is missing, not installed, or not installed in a proper location.*	LT ☐				
	Carbon monoxide alarm is obstructed.	LT ☐	LT ☐			
	Carbon monoxide alarm does not produce an audio or visual alarm when tested.	LT ☐	LT ☐			
Ceiling	Ceiling has an unstable surface.	M ☐	M ☐			
	Ceiling has a hole.	M ☐	M ☐			
	Ceiling component(s) is not functionally adequate.	S ☐	S ☐			
Chimney	A visually accessible chimney, flue, or firebox connected to a fireplace or wood-burning appliance is incomplete or damaged such that it may not safely contain fire and convey smoke and combustion gases to the exterior.	LT ☐	LT ☐	LT ☐		
	Chimney exhibits signs of structural failure.			LT ☐		

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Clothes Dryer Exhaust Ventilation	Electric dryer transition duct is detached or missing.	LT ☐	LT ☐		
	Gas dryer transition duct is detached or missing.	LT ☐	LT ☐		
	Electric dryer exhaust ventilation system has restricted airflow.	LT ☐	LT ☐	LT ☐	
	Dryer transition duct is constructed of unsuitable material.	LT ☐	LT ☐		
	Gas dryer exhaust ventilation system has restricted airflow.	LT ☐	LT ☐	LT ☐	
	Exterior dryer vent cover, cap, or a component thereof is missing.			L ☐	
Cooking Appliance	Cooking range, cooktop, or oven does not ignite or produce heat.	S ☐	L ☐		
	Cooking range, cooktop, or oven component is damaged or missing such that the device is unsafe for use.	M ☐	M ☐		
	Primary cooking appliance is missing.*	*M ☐			
	A microwave is the primary cooking appliance and it is damaged.	S ☐			
	A burner does not produce heat, but at least 1 other burner is present on the cooking range or cooktop and does produce heat.	M ☐	M ☐		
Door - Entry	Entry door will not open.	M ☐	M ☐		
	Entry door will not close.	S ☐	M ☐		
	Entry door self-closing mechanism is damaged, inoperable, or missing.	S ☐	M ☐		
	Hole, split, or crack that penetrates completely through entry door.	M ☐	M ☐		
	Entry door is missing.	LT ☐	S ☐		
	Entry door surface is delaminated or separated.	M ☐	M ☐		
	Entry door frame, threshold, or trim is damaged or missing.	M ☐	M ☐		
	Entry door seal, gasket, or stripping is damaged, inoperable, or missing.	M ☐	M ☐		
	Entry door component is damaged, inoperable, or missing and it does not limit the door's ability to provide privacy or protection from weather or infestation.	L ☐	L ☐		
Door - Fire	Entry door cannot be secured.	S ☐	M ☐		
	Fire labeled door does not open.	S ☐	S ☐		
	Fire labeled door does not close and latch or the self-closing hardware is damaged or missing such that the door does not self-close and latch.	S ☐	S ☐		
	Fire labeled door assembly has a hole of any size or is damaged such that its integrity may be compromised.	S ☐	S ☐		
	Fire labeled door seal or gasket is damaged or missing.	S ☐	S ☐		
	An object is present that may prevent the fire labeled door from closing and latching or self-closing and latching.	S ☐	S ☐		
	Fire labeled door cannot be secured.	S ☐	M ☐		
Door - General	Fire labeled door is missing.	LT ☐	LT ☐		
	A passage door does not open.	M ☐	M ☐		
	A passage door component is damaged, inoperable, or missing and the door is not functionally adequate.	L ☐	L ☐		
	A door that is not intended to permit access between rooms has a damaged, inoperable, or missing	L ☐			
	An exterior door component is damaged, inoperable, or missing.			M ☐	

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Drain	Drain is fully blocked.	M ☐	M ☐	M ☐	
Egress	Obstructed means of egress.	LT ☐	LT ☐	LT ☐	
	Sleeping room is located on the 3rd floor or below and has an obstructed rescue opening.	LT ☐			
	Fire escape access is obstructed.	LT ☐			
Electrical - Conductor, Outlet, and Switch	Outlet or switch is damaged.	LT ☐	LT ☐	LT ☐	
	Testing indicates a three-pronged outlet is not properly wired or grounded.	S ☐	S ☐	S ☐	
	Outlet does not have visible damage and testing indicates it is not energized.	S ☐	S ☐	S ☐	
	Exposed electrical conductor.	LT ☐	LT ☐	LT ☐	
	Water is currently in contact with an electrical conductor.	LT ☐	LT ☐		
Electrical - GFCI/AFCI	GFCI outlet or GFCI breaker is not visibly damaged and the test or reset button is inoperable.	S ☐	S ☐	S ☐	
	AFCI outlet or AFCI breaker is not visibly damaged and the test or reset button is inoperable.	S ☐	S ☐	S ☐	
	An unprotected outlet is present within six feet of a water source.*	*S ☐	*S ☐	*S ☐	
Electrical - Service Panel	Electrical service panel is not readily accessible.	M ☐	M ☐	M ☐	
	The overcurrent protection device is damaged.	LT ☐	LT ☐	LT ☐	
	The overcurrent protection device is contaminated.	S ☐	S ☐	S ☐	
Elevator	Elevator is inoperable.		M ☐		
	Elevator door does not fully open and close.		M ☐		
	Elevator cab is not level with the floor.		M ☐		
	Safety edge device has malfunctioned or is inoperable.		M ☐		
Exit Sign	Exit sign is damaged, missing, obstructed, or not adequately illuminated.		LT ☐	LT ☐	
Fence and Gate	Fence component is missing.			M ☐	
	Gate does not open, close, latch, or lock.			M ☐	
	Fence demonstrates signs of collapse.			M ☐	
Fire Escape	Fire escape component is damaged or missing.			LT ☐	
Fire Extinguisher	Fire extinguisher pressure gauge reads over or under-charged.	LT ☐	LT ☐	LT ☐	
	Fire extinguisher service tag is missing, illegible, or expired.	LT ☐	LT ☐	LT ☐	
	Fire extinguisher is damaged or missing.	LT ☐	LT ☐	LT ☐	
Flammable and Combustible Item	Flammable or combustible item is on or within 3 feet of an appliance that provides heat for thermal comfort or a fuel-burning water heater. OR Improperly stored chemicals.	LT ☐	LT ☐	LT ☐	
Floor	Floor substrate is exposed.	M ☐	M ☐		
	Floor component(s) is not functionally adequate.	M ☐	M ☐		
Food Preparation	Food preparation area is not present.*	*M ☐			
	Food preparation area is damaged or is not functionally adequate.	M ☐	M ☐		

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Foundation	Foundation is cracked.	M ☐	M ☐	M ☐	
	Foundation has exposed rebar or foundation is spalling, flaking, or chipping.	M ☐	M ☐	M ☐	
	Foundation is infiltrated by water.	M ☐	M ☐		
	Foundation support post, column, beam, or girder is damaged.	M ☐	M ☐	M ☐	
	Foundation vent cover is missing or damaged.			M ☐	
Garage Door	Garage door has a hole.	M ☐	M ☐	M ☐	
	Garage door does not open, close, or remain open or closed.	M ☐	M ☐	M ☐	
Grab bar	Grab bar is not secure.	M ☐	M ☐		
Guardrail	Guardrail is missing or not installed.*	*LT ☐	*LT ☐	*LT ☐	
	Guardrail is not functionally adequate.	LT ☐	LT ☐	LT ☐	
Handrail	Handrail is missing.	M ☐	M ☐	M ☐	
	Handrail is not secure.	M ☐	M ☐	M ☐	
	Handrail is not functionally adequate.	M ☐	M ☐	M ☐	
	Handrail is not installed where required.		L ☐	L ☐	
HVAC	The inspection date is on or between October 1 and March 31 and the permanently installed heating source is not working or the permanently installed heating source is working and the interior temperature is below 64 degrees Fahrenheit.*	*LT ☐			
	The inspection date is on or between October 1 and March 31 and the permanently installed heating source is working and the interior temperature is 64 to 67.9 degrees Fahrenheit.*	*S ☐			
	Air conditioning system or device is not operational.	M ☐	L ☐		
	Unvented space heater that burns gas, oil, or kerosene is present.*	*LT ☐	*LT ☐		
	Combustion chamber cover or gas shutoff valve is missing from a fuel burning heating appliance.	LT ☐	LT ☐		
	Heating system or device safety shield is damaged or missing.	S ☐	S ☐		
	The inspection date is on or between April 1 and September 30 and a permanently installed heating source is damaged, inoperable, missing, or not installed.*	*M ☐	*M ☐		
	Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing.	LT ☐	LT ☐	LT ☐	
Infestation	The inspection date is on or between October 1 and March 31 and the permanently installed heating source is inoperable.		M ☐		
	Evidence of cockroaches.	M ☐	M ☐		
	Extensive cockroach infestation.	S ☐	M ☐		
	Evidence of bedbugs.	M ☐	M ☐		
	Extensive bedbug infestation.	S ☐	M ☐		
	Evidence of mice.	M ☐	M ☐		
	Extensive mouse infestation.	S ☐	M ☐		
	Evidence of rats.	M ☐	M ☐	M ☐	
	Extensive rat infestation.	S ☐	S ☐		
	Evidence of other pests.	M ☐	M ☐		

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Leak - Gas/Oil	Natural gas, propane, or oil leak.	LT ☐	LT ☐	LT ☐	
Leak - Sewage	Blocked sewage system.	S ☐	S ☐	S ☐	
	Leak in sewage system.	S ☐	S ☐	S ☐	
	Cap to the cleanout or pump cover is detached or missing.	M ☐	M ☐	M ☐	
	Cleanout cap or riser is damaged.	M ☐	M ☐	M ☐	
Leak - Water	Environmental water intrusion.	M ☐	M ☐		
	Plumbing leak.	M ☐	M ☐	L ☐	
	Fluid is leaking from the sprinkler assembly.	M ☐	M ☐	L ☐	
Lighting - Auxiliary	Auxiliary lighting is damaged, missing, or fails to illuminate when tested.		S ☐	S ☐	
Lighting - Exterior	A permanently installed light fixture is damaged, inoperable, missing, or not secure.			M ☐	
Lighting - Interior	A permanently installed light fixture is inoperable.	M ☐	M ☐		
	A permanently installed light fixture is not secure.	M ☐	M ☐		
	At least one (1) permanently installed light fixture is not present in the kitchen and bathroom.*	*M ☐	*M ☐		
Litter	Litter is accumulated in an undesignated area.		M ☐	L ☐	
Minimum Electrical and Lighting	At least two (2) working outlets are not present within each habitable room. OR At least one (1) working outlet and one (1) permanently installed light fixture is not present within each habitable room.*	*M ☒			
Mold-Like Substance	Presence of mold-like substance at moderate levels is observed visually.	M ☐	L ☐		
	Presence of mold-like substance at high levels is observed visually.	S ☐	M ☐		
	Presence of mold-like substance at extremely high levels is observed visually.	LT ☐	S ☐		
	Elevated moisture level.	M ☐	L ☐		
Parking Lot	Parking lot has any one pothole that is 4 inches deep and 1 square foot or greater.			M ☐	
	Parking lot has ponding.			M ☐	
Potential Lead-Based Paint Hazards - Visual Assessment	Paint in a Unit or Inside the target property is deteriorated – below the level required for lead-safe work practices by a lead-certified firm or for passing clearance.	M ☐	M ☐		
	Paint in a Unit or Inside the target property is deteriorated – above the level required for lead-safe work practices by a lead-certified firm and passing clearance.	S ☐	S ☐		
	Paint Outside on a target property is deteriorated – below the level required for lead-safe work practices by a lead-certified firm or for passing clearance.			M ☐	
	Paint Outside on a target property is deteriorated – above the level required for lead-safe work practices by a lead-certified firm and passing clearance.			S ☐	
Private Roads and Driveways	Road or driveway access to the property is blocked or impassable for vehicles.			S ☐	
	Road or driveway has any one pothole that is 4 inches deep and 1 square foot or greater.			M ☐	
Refrigerator	Refrigerator is inoperable such that it may be unable to safely and adequately store food.	M ☐	M ☐		
	Refrigerator component is damaged such that it impacts functionality.	M ☐	M ☐		
	Refrigerator is missing.*	*M ☐			

Paint in a unit or inside the target property that is deteriorated above the level required for lead-safe work practices by a lead-certified firm and passing clearance may require a 24 hour correction time period.

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Retaining Wall	Retaining wall is leaning away from the fill side.			M ☐	
	Retaining wall is partially or completely collapsed.			M ☐	
Roof Assembly	Restricted flow of water from a roof drain, gutter, or downspout.			M ☐	
	Gutter component is damaged, missing, or unfixed.			M ☐	
	Roof surface has standing water.			M ☐	
	Substrate is exposed.			M ☐	
	Roof assembly has a hole.			M ☐	
	Roof assembly is damaged.			M ☐	
Sharp Edges	A sharp edge that can result in a cut or puncture hazard is present.	S ☐	S ☐	S ☐	
Sidewalk, Walkway, Ramp	Sidewalk, walkway, or ramp is blocked or impassable.			M ☐	
	Sidewalk, walkway, or ramp is not functionally adequate.			M ☐	
Sink	Sink or sink component is damaged or missing and the sink is not functionally adequate.	M ☐	L ☐		
	Water is directed outside of the basin.	L ☐	L ☐		
	Sink is not draining.	M ☐	M ☐		
	Sink is improperly installed, pulling away from the wall, leaning, or there are gaps between the sink and wall.	M ☐	M ☐		
	Sink component is damaged or missing and the sink is functionally adequate.	L ☐	L ☐		
	Cannot activate or deactivate hot and cold water.*	*M ☐	M ☐		
	Sink is missing or not installed within the primary kitchen.*	*M ☐			
Site Drainage	Water runoff is unable to flow through the site drainage system.			L ☐	
	Erosion is present.			L ☐	
	Grate is not secure or does not cover the site drainage system's collection point.			M ☐	
Smoke Alarm	Smoke alarm is not installed where required.*	*LT ☐	*LT ☐		
	Smoke alarm is obstructed.	LT ☐	LT ☐		
	Smoke alarm does not produce an audio or visual alarm when tested.	LT ☐	LT ☐		
Sprinkler Assembly	Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head.	LT ☐	LT ☐	LT ☐	
	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance.	LT ☐	LT ☐		
	Sprinkler assembly has evidence of corrosion.	LT ☐	LT ☐	LT ☐	
	Sprinkler assembly has evidence of foreign material that is detrimental to performance.	LT ☐	LT ☐	LT ☐	
Stairs	Tread is missing or damaged.	M ☐	M ☐	M ☐	
	Stringer is damaged.	M ☐	M ☐	M ☐	
Steps and Stairs	Step or stair is not functionally adequate.			M ☐	
Structure	Structural system exhibits signs of serious failure.	LT ☐	LT ☐	LT ☐	

Area	Deficiency Description	Unit	Inside	Outside	Inspector Comments
Toilet	Only 1 toilet was installed, and it is missing.	LT ☐	M ☐		
	A toilet is missing and at least 1 toilet is installed elsewhere that is operational.	M ☐	M ☐		
	Only 1 toilet was installed, and it is damaged or inoperable.	S ☐	M ☐		
	A toilet is damaged or inoperable and at least 1 toilet is installed elsewhere that is operational.	M ☐	M ☐		
	Toilet component is damaged, inoperable, or missing such that it may limit the resident's ability to safely discharge human waste.	M ☐	M ☐		
	Toilet is not secured at the base.	M ☐	M ☐		
	Toilet component is damaged, inoperable, or missing and it does not limit the resident's ability to discharge human waste.	L ☐	L ☐		
	Toilet cannot be used in private.*	*M ☐	M ☐		
Trash Chute	Chute door does not open or self-close and latch.		M ☐		
	Chute is clogged.		M ☐		
Trip Hazard	Trip hazard on walking surface.	M ☐	M ☐	M ☐	
Ventilation	Exhaust system does not respond to the control switch.	M ☐	M ☐		
	Exhaust system has restricted airflow.	M ☐	M ☐		
	Exhaust system component is damaged or missing.	M ☐	M ☐		
	Bathroom does not have proper ventilation or dehumidification.	M ☐	M ☐		
Wall - Exterior	Exterior wall covering has missing sections of at least 1 square foot per wall.			M ☐	
	Exterior wall has peeling paint of 10 square feet or more.			M ☐	
	Exterior wall component(s) is not functionally adequate.			M ☐	
Wall - Interior	Interior wall has a loose or detached surface covering.	M ☐	M ☐		
	Interior wall component(s) is not functionally adequate.	M ☐	M ☐		
	Interior wall has a hole that is greater than 2 inches in diameter or there is an accumulation of holes that are cumulatively greater than 6 inches by 6 inches.	M ☐	M ☐		
Water Heater	Temperature pressure relief (TPR) valve has an active leak or is obstructed or relief valve discharge piping is damaged, capped, has an upward slope, or is constructed of unsuitable material.	S ☐	S ☐	S ☐	
	No hot water.	S ☐	L ☐		
	The relief valve discharge piping is missing or terminates greater than 6 inches or less than 2 inches from waste receptor flood-level.	M ☐	M ☐	M ☐	
	Chimney or flue piping is blocked, misaligned, or missing.	LT ☐	LT ☐	LT ☐	
	Gas shutoff valve is damaged, missing, or not installed.	LT ☐	LT ☐	LT ☐	
Window	Window will not open or stay open.	M ☐	L ☐		
	Window cannot be secured.	M ☐	L ☐		
	Window will not close.	S ☐	M ☐		
	Window component is damaged or missing and the window is not functionally adequate.	M ☐	M ☐		

Burden Statement: The purpose of this information collection is to strengthen the U.S. Department of Housing and Urban Development (HUD)'s physical condition standards and improve HUD's oversight of housing pursuant to the National Standards for the Physical Inspection of Real Estate (NSPIRE) inspection regulations, requirements, and procedures. The information collected on this optional checklist form will be used by Public Housing Agencies (PHAs) to determine if a housing unit meets NSPIRE Standards for the Housing Choice Voucher (HCV) and Project Based Voucher (PBV) programs. This is a voluntary form and not required for use. Additionally, assurances of confidentiality are not provided under this collection. The public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Office of Policy and Partnerships, Real Estate Assessment Center, Office of Public and Indian Housing, Department of Housing and Urban Development, 550 12th Street SW, Suite 100, Washington, DC 20410-4000. HUD may not conduct and sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number.