

State of Wisconsin  
Preservation and Reinvestment  
Initiative for Community  
Enhancement (PRICE),  
Application and Plan

WORKING DRAFT IN PREPARATION FOR PUBLIC COMMENT, May 16,  
2024



**DEHCR**

Division of Energy, Housing and Community Resources

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

# Contents

Executive Summary.....	4
Introduction .....	5
Background on DEHCR.....	5
Manufactured Housing - Definition and Issues Faced by Owners .....	5
Project Area and Need for Accessible Housing.....	6
Map 1: Wisconsin’s Congressional Districts.....	6
Table 1: MHCs and Median Household Incomes by Congressional District .....	7
Is your project within or does it include any communities that meet Distress Criteria? .....	11
Does your proposal increase resilience in any disaster-prone areas?.....	11
What are the barriers to manufactured housing preservation or revitalization in your project area? .....	11
What are your vision and goals?.....	12
Which eligible activities will you use to address the need(s) described in Factor (a)? What is your budget?.....	12
What is your timeline and key tasks along that timeline?.....	13
What is your budget.....	<b>Error! Bookmark not defined.</b>
What are the projected impacts of your activities if implemented?.....	13
How will you ensure the availability of affordable manufactured housing options to LMI households? How does your proposal encourage access to resources and financing, especially for underserved communities and persons? .....	13
<b>Funding for Acquisitions and Refinancing</b> .....	14
<b>Infrastructure Funding</b> .....	15
<b>Municipal Maintenance of Manufactured Housing Infrastructure</b> .....	15
<b>Funding for Repair, Rehabilitation and replacement of Manufactured Housing Units</b> .....	15
What protections will be in place for residents? .....	15
How does your proposal encourage access to resources and financing, especially for underserved communities and persons?.....	16
What significant hazards could impact your project site(s)?.....	16
How does your proposal help advance Environmental Justice (as defined in Section I.A.4 of this NOFO)?.....	17
How will you seek and encourage diverse stakeholder participation? .....	17
How does your proposal align with existing community plans and policies? .....	18
What experience do you have managing projects?.....	18
What is your experience using grant funds? .....	18
Who are your key staff?.....	19
What is your experience promoting racial equity?.....	20
What is your experience completing environmental reviews? .....	20
Are you familiar with cross-cutting federal requirements?.....	21
How will your proposed activities retain other affordable housing opportunities for LMI households in the community? How will you ensure LMI households are not eventually priced out of the community? How will you help current renters and homesite renters become homeowners or otherwise acquire an interest in the lot? .....	21

How will your proposed activities promote stable homeownership options in the long-term, including both the house itself and the lot on which it sits? ..... 22

How will your proposal support underserved communities in the long term? How will your proposed activities advance housing access and justice for vulnerable populations or underserved communities? How will your proposal enable underserved communities, particularly those of color, to build wealth over the long term? ..... 22

How will your proposal make manufactured housing or MHCs livable, sustainable, and resilient? Examples may include, but are not limited to, long-term benefits of mitigation activities, weatherization, or infrastructure enhancement in MHCs. You may also describe how your proposal reduces resident health risks or exposure to environmental hazards. . 24

## Executive Summary

The State of Wisconsin is submitting its application for PRICE Main funds pursuant to the U.S. Department of Housing and Urban Development's (HUD) Notice of Funding Opportunity (NOFO), funding opportunity number FR-6700-N-99. PRICE was established under Title II of the American Rescue Plan Act of 2021 (the "Act") and provides \$225,000,000 in total financial assistance to be competitively awarded, through the United States Department of Housing and Urban Development ("HUD"). Governor Tony Evers directed the Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) to apply for PRICE main funds on behalf of the State of Wisconsin. The goals of the PRICE grant are to preserve long-term housing affordability for residents of manufactured housing or an MHC, to redevelop MHCs, and to primarily benefit low- and moderate-income (LMI) residents. For more information related to the PRICE grant and HUD's guidance to recipients, please visit: [https://www.hud.gov/program\\_offices/comm\\_planning/price](https://www.hud.gov/program_offices/comm_planning/price).

This application outlines the manufactured home community (MHC) landscape in Wisconsin and estimates the need for funding pursuant to the goals identified in the PRICE NOFO. There are an estimated 84,592 manufactured housing units in Wisconsin and an estimated 1,235 MHCs in Wisconsin. 71 of Wisconsin's 72 counties contain an MHC subject to state licensure. There are several significant challenges that may impact housing stability for those that own or rent manufactured homes. For some manufactured housing owners who rent a lot in a manufactured housing community (MHC), there is the potential for landowners or investors to increase lot rents, forcing homesite renters to make a difficult decision: pay to move their home, pay the increased rent, or leave their valuable asset. In addition, due to the impacts of the Coronavirus pandemic, manufactured homeowners may be in arrears with other types of housing debt, such as chattel loans or retail installment contracts due to the limited financing options often available to those living in manufactured homes.

The State of Wisconsin's PRICE application proposes a slate of programs aimed at providing a variety of assistance to low- and moderate-income households living in manufactured housing. Proposed areas of assistance include providing assistance with infrastructure upgrades or replacement in existing MHC's, repair, rehabilitation and replacement of manufactured home units, and acquisition and down payment assistance to assist residents of a manufactured home community to purchase the community therefore transferring ownership from privately owned community to resident owned.

# Introduction

## Background on DEHCR

The Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) develops housing policy and offers a broad range of program assistance and funds to address 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. In addition, DEHCR administers the statewide program to assist eligible households by providing electric and heating bill payment assistance, as well as benefits and services to assist with energy crisis situations. Eligible households may also receive weatherization services.

## Manufactured Housing - Definition and Issues Faced by Owners

Manufactured housing can be permanently affixed to the lot underneath or be affixed to a support and anchoring system that allows the home to be relocated more easily. Manufactured housing is subject to HUD certification requirements pursuant to the regulations set forth in 24 CFR part 3282 (Manufactured Home Procedural and Enforcement Regulation) and the Manufactured Home Construction and Safety Standards set forth in 24 CFR 3280 (see the definition of manufactured housing in 24 CFR 3280.2).

There are an estimated 84,592 manufactured housing units in Wisconsin<sup>1</sup> and an estimated 1,235 MHCs in Wisconsin. An estimated 52,020 are owner-occupied manufactured housing units, while 11,659 households rent a manufactured housing unit. 71 of Wisconsin's 72 counties contain an MHC subject to state licensure. In Wisconsin, the Department of Safety and Professional Services (DSPS) oversees several manufactured home community functions: 1) licensing of new manufactured home communities and renewing current licensed communities; 2) regulation of manufactured home communities; 3) the investigation and resolution of manufactured home community complaints; 4) plan review for private sewage systems serving manufactured home communities; 5) plan review for some plumbing system features; 6) site installation features and basement or addition construction requirements; 7) licensing of manufactured home manufacturers; and 8) titling of manufactured/mobile homes. These functions are performed subject to Wisconsin State Statute § 101.935 and Wisconsin Administrative Code SPS §302 and 326.

There are several significant challenges that may impact housing stability for those that own or rent manufactured homes. Despite perceptions of manufactured housing as "mobile," manufactured housing can be very expensive and complicated to move, and more than 90% of manufactured homes do not move after the initial installation. This can present a significant challenge for owners of manufactured homes who do not own the lot underneath their unit (referred to as "homesite renters" for the purposes of this application). For some manufactured housing owners who rent a lot in a manufactured housing community (MHC), there is the potential for landowners or investors to increase lot rents, forcing homesite renters to make a difficult decision: pay to move their home, pay the increased rent, or leave their valuable asset.

Many prospective homeowners looking to purchase a manufactured home may have no option but to finance their home with personal property or "chattel" loans, which often have higher interest rates than typical real property mortgages. Data collected under the Home Mortgage Disclosure Act (HMDA) in 2018 suggests that interest rates charged for loans secured only by a manufactured home are higher on average than for a conventional mortgage loan. In 2018, the average interest rate for loans backed only by the manufactured home was 8.5%, compared to 4.7% for loans on site-built single-family homes and 5.4% on loans secured by both the manufactured home and the land on which the home is located.<sup>2</sup> In addition, loan terms are generally 20 years instead of the typical 30 years for fixed-rate mortgages, which increases the monthly payment. Certain chattel financing products may have fewer consumer protections than mortgage loans.

---

<sup>1</sup> U.S. Census Bureau, American Community Survey, 2022 ACS

<sup>2</sup> HMDA 2018 Single Family, 1<sup>st</sup> Lien originations excluding improvement loans and origination rates over 20%.

Many older manufactured homes require repairs or enhancements to make them livable and suitable to their environment, or they are sited in hazard prone areas. Nationwide, nearly a third of households living in manufactured housing are headed by an elderly individual, and manufactured housing households have a higher prevalence of a significant disability. These vulnerable populations need access to infrastructure such as sidewalks, ramps, accessible parking, broadband access, and other amenities that are often unavailable for residents of manufactured housing. The infrastructure serving manufactured housing communities is often self-operated, not built to high standards, and has become increasingly stressed by deferred maintenance and extreme climate and weather events.

## Project Area and Need for Accessible Housing

Wisconsin is home to more than 5.8 million (5,800,000) people, living in approximately 2.725 million (2,725,000) housing units. The State is administratively divided into seventy-two (72) counties, one thousand two hundred and sixty (1,260) towns, four hundred thirteen (413) villages, and one hundred and ninety (190) cities.

Since 2013, Wisconsin has also been organized into eight (8) Congressional Districts. (See Map 1.) The districts are used in this document to describe the State’s demographic, economic, and housing conditions and how they vary geographically.

Map 1: Wisconsin’s Congressional Districts



Manufactured housing — as defined above — represents a measurable portion of Wisconsin’s affordable housing stock. According to Census data, more than eighty-four thousand five hundred and ninety-two manufactured housing units are located in Wisconsin (84,592). Wisconsin’s Department of Safety and Professional Services currently identifies 1,235 MHCs; 71 of Wisconsin’s 72 counties have Manufactured Home Communities subject to state licensure located within their boundaries.

Nationwide, manufactured housing represents 6.3% of the nation’s housing stock but is a higher share of housing stock in rural areas. While site-built single-family homes represent about 80% of housing stock in rural areas, manufactured housing represents about 14% of stock. Apartments trail a distant third, representing only about 6% of the stock in rural areas. In Wisconsin, manufactured homes are also more prevalent in the rural regions of the state; these areas tend to be lower income than some of the more urban and suburban parts of the state. Table 1 shows

the number of licensed MHC locations, alongside Census data on the median household income by Congressional District. More than seventy percent (70%) of the MHCs are in Districts where the median income is less than the State median of \$60,800.

**Table 1: MHCs and Median Household Incomes by Congressional District**

District	Number of MHC's	Median Household Income
District 1	46	\$67,231
District 2	102	\$67,394
District 3	346	\$57,953
District 4	17	\$45,057
District 5	55	\$70,271
District 6	163	\$59,868
District 7	350	\$57,200
District 8	156	\$61,423
<b>Statewide</b>	<b>1,235</b>	<b>\$60,800</b>

U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2015-2019, Wisconsin Department of Safety and Professional Services, "Manufactured Home Communities in Wisconsin by County" 6/9/2023

The State of Wisconsin is proposing a statewide project area, due to statewide need and geographic dispersal of potential projects. The state as a whole has a need for affordable, accessible housing as demonstrated below.

**Population Within the State of Wisconsin Experiencing Housing Problems**

***0%-30% of Area Median Income***

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	213,972	33,775	13,862
White	160,904	27,391	9,238
Black / African American	31,090	3,621	2,188
Asian	4,109	413	1,048
American Indian, Alaska Native	2,768	921	280
Pacific Islander	64	0	0
Hispanic	12,594	1,021	922

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

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

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

homelessness or would serve those at greatest risk of housing instability.

**30%-50% of Area Median Income**

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

The table above shows that among low-income households (30-50% area median income) in Wisconsin, 67.8% have one or more housing problems. There is a disproportionately greater need among low-income Black/ African American households. The rate of housing problems among these Black/ African American households is 79.0%, which is 11.2% greater than the jurisdiction as a whole.

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

**50%-80% of Area Median Income**

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

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

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



## Population Within the State of Wisconsin Experiencing Severe Housing Problems

### *0%-30% of Area Median Income*

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

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

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

### *30%-50% of Area Median Income*

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

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

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

### 50%-80% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	46,222	368,868	0
White	38,266	324,716	0
Black / African American	2,487	19,484	0
Asian	1,869	3,958	0
American Indian, Alaska Native	271	2,963	0
Pacific Islander	4	54	0
Hispanic	2,953	14,703	0

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

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

### Housing Cost Burden

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

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

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

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 within 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.

The U.S. Census Bureau American Community Survey (ACS) 1-Year Estimate 2022 estimates that one out of five Americans has a disability, which correlates closely to Wisconsin. With the population of Wisconsin aging, and the likelihood of having a disability increasing with age, growth in this number is expected to accelerate at a rapid pace in the coming decades. ACS estimates for 2022 indicate 18.7 percent of Wisconsinites are 65 years old and over. The need to market the factory-built housing products to aging Americans is even more apparent when consideration is given to population statistics. The baby boom generation accounts for people born between 1946 and 1964. This generation controls seventy percent of the wealth in the United States, and they are aging, which in turn means the need for accessible housing is on the rise.

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. MHC data indicates a high percentage of housing stock is deficient in multiple categories and needs rehabilitation, and in extreme cases, replacement. Unfortunately, existing programs to provide for these needs are lacking. Additionally, MHC data indicates a need for infrastructure repair, replacement or upgrading throughout the state. Identified infrastructure projects typically cost upwards of \$1 million and without assistance from outside sources, will result in major lot rent increases, further stressing low and moderate-income households currently living there. Without additional funds, these needs will persist.

## Is your project within or does it include any communities that meet Distress Criteria?

Yes. Multiple communities with MHC's are located in areas that meet Distress Criteria.

## Does your proposal increase resilience in any disaster-prone areas?

Potentially. Multiple MHCs are located in FEMA-demarcated disaster-prone counties: Crawford, Trempealeau and Vernon.

## What are the barriers to manufactured housing preservation or revitalization in your project area?

Residents of manufactured housing communities face many challenges including delayed maintenance and repairs of infrastructure which can create dangerous conditions, increased lot rents, as well as the sale and eviction of the community to an investor. When community repairs are addressed, the costs are passed onto residents, creating economic hardship for many. PRICE funds will be available for infrastructure repairs and improvements. The funds will be provided as a grant therefore keeping the increased costs associated with the improvements much lower than traditional financing may offer.

Residents wishing to purchase the MHC often times do not have the funding or expertise available to purchase the community. Financing an MHC can be costly, and a large number of lower income residents are not able to afford such a

large increase within their budgets. The PRICE grant will provide financial acquisition assistance to help facilitate the purchase of an MHC by its residents. The grant funds will enable the residents to purchase the community and keep the costs associated with the purchase to more manageable levels. LMI households wishing to purchase a manufactured home and/or a lot may not have the financial resources to finance the entire purchase or the cost to finance the purchase is too costly for their budget.

Just like all homes, manufactured homes require repair and maintenance. Unfortunately, homes located within an MHC are considered personal property and not real estate and financial assistance for repairs more expensive. Public programs such as the Community Development Block Grant Program, also administered by the State of Wisconsin, is not available to manufactured homes considered personal property. Due to the costliness of repairs and lack of public resources available for repairs, many manufactured homeowners are unable to keep their homes and make needed and necessary repairs, including accessibility and needed updates.

Due to the perception and stigma of manufactured housing communities and owning a manufactured home, a large number of manufactured housing communities are often located in part of a community that is segregated from the site-built housing stock. Segregation can lead to lowered access to community amenities and reduced property values of residents. Utilizing PRICE funds, the State will provide residents with the financial resources to address the needs of the community, stabilizing costs and increasing access to affordable, safe, sanitary housing.

Due to higher interest rates and less housing stock available, purchasing a site-built home has become unaffordable for many households, especially those with lower incomes. According to the Wisconsin Realtors Association (WRA) the median sale price in 2023 for a home in Wisconsin was \$285,000.00<sup>3</sup>. Interest rates are currently around 7% for a 30-year fixed mortgage. To finance a purchase using these values with a 10% down payment, a household's principal and interest payment would be around \$1800 per month. This would not include property taxes or insurance.

## **SOUNDNESS OF APPROACH**

### **What are your vision and goals?**

The State of Wisconsin proposes a grant program to fund infrastructure improvements, the acquisition of manufactured home parks, and manufactured home repair, rehabilitation and replacement. The program will address the needs of aging manufactured home communities throughout the state and prioritizes projects based on income, health, safety and critical need improvements. The program also prioritizes projects that leverage support from local municipalities or projects converting a community to a cooperative ownership model.

Eligible applicants will include units of general local government, privately, publicly, or cooperatively owned communities, as well as nonprofit organizations acting as an intermediary on behalf of a park. Funds will be available statewide through a competitive request for proposals (RFP) process, including entitlement communities. A portion of the award will be made available to the CDBG Regional Housing Program to administer as part of their regional housing award. Assistance is limited to households at or below 80% County Median Income (CMI) and for activities such as infrastructure to manufactured home communities, 51% of the residents must be 80% or less of the CMI.

### **Which eligible activities will you use to address the need(s) described in Factor (a)? What is your budget?**

The State of Wisconsin, utilizing PRICE funding intends to include the following activities in its' grant application:

1. Development or repair of infrastructure to support manufactured housing communities and home ownership opportunities. \$10 million allocated to this goal.

---

<sup>3</sup> Wisconsin Realtors Association, Housing Statistics: <https://www.wra.org/HousingStatistics/>

2. Repair, rehab, and replacement of manufactured units. Also includes accessibility features (ramps, etc.) \$5 million allocated to this goal.
3. Acquisition and down payment assistance. These funds may be used to assist residents of a manufactured home community to purchase the community therefore transferring ownership from privately owned community to resident owned. Down payment assistance may also be used to assist individuals to purchase a manufactured home to be placed within a manufactured home community or to assist in the purchase of a manufactured home already located in the community. \$15 million allocated to this goal.

Total budget: \$30 million. Includes up to a total maximum of 10% for grantee administrative costs.

Please see the attached budget worksheet for additional detail.

## What is your timeline and key tasks along that timeline?

Should a PRICE grant be awarded, the following is the projected timeline.

ACTIVITY	IMPLEMENTATION DATE
NOFO DEVELOPED	45 DAYS AFTER GRANT AWARD
APPLICATION DEVELOPED	45 DAYS AFTER GRANT AWARD
PROGRAM RULES & MANUAL DEVELOPED	60 DAYS AFTER GRANT AWARD
PRICE WEBSITE UP AND RUNNING	60 DAYS AFTER GRANT AWARD
AP UPLOADED IN DRGR	90 DAYS AFTER GRANT AWARD
NOFO RELEASED	90 DAYS AFTER GRANT AWARD
APPLICATIONS AVAILABLE	90 DAYS AFTER GRANT AWARD
APPLICATION TRAINING	30 DAYS AFTER NOFO RELEASED
MANUAL AND PROGRAM RULES COMPLETE	150 DAYS AFTER GRANT AWARD
APPLICATIONS DUE	90 DAYS AFTER APPLICATION RELEASE
APPLICATION AWARD	ANTICIPATED 60 DAYS AFTER DUE DATE
AWARD ANNOUNCEMENT	30 DAYS AFTER AWARDS MADE
GRANT AGREEMENTS SENT	60 DAYS AFTER DUE DATE
GRANT AGREEMENTS RETURNED	90 DAYS AFTER DUE DATE

## What are the projected impacts of your activities if implemented?

The proposed activities will provide a number of benefits for low to moderate income households as well as the community in which the activities are located.

The PRICE program will provide affordable home ownership opportunities and the stability that comes with owning a home for many LMI households that may not otherwise been able to be a homeowner. Home ownership provides many positive benefits including accumulation of wealth, improved mental and physical health benefits, improved performance and development of children and a sense of belonging in your community. Homeownership helps break decades of institutional racism, segregation, and economic inequality.

When used as a financing and acquisition tool to convert an investor-owned MHC to a resident-owned community (ROC), PRICE will offer financial protection and stability for the residents. The residents will have input over the future of the community including controlling costs, lot increases, repairs, and improvements. ROC's use the voice of its owners to make major decisions. As a result, residents will be protected from unjust evictions, unsubstantiated lot increases, and the sale of the property which may displace the MHC as a whole.

How will you ensure the availability of affordable manufactured housing options to LMI households? How does your proposal encourage access to resources and

## financing, especially for underserved communities and persons?

Wisconsin has 84,592 units of manufactured housing units in 1,235 MHC's. The residents of these communities are under increasing risk of losing their affordability due to investors buying up communities and raising rents. Residents are also at risk of outright closure of their communities due to failure of the property's private infrastructure systems. The State will balance affordability with the opportunity to build financial security and wealth for manufactured homeowners and if applicable, will encourage lot ownership for the siting of manufactured homes. The State will prioritize access to funds for MHC's with high rates of poverty, living in overcrowded homes and located in historically underserved areas or housing historically underserved populations. Projects receiving funding will increase accessible and affordable housing opportunities for individuals with disabilities and participants will be provided with opportunities for integrated and independent living with access to voluntary supportive services such as health services and transportation. Lastly, funded projects may provide economic opportunities to low-income individuals; however, all recipients will experience economic benefits through reduced costs and lowered exposure to cost increases. The State of Wisconsin has a long track record of hiring, training, contracting, and providing other economic opportunities in furtherance of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and its implementing regulations at 24 CFR part 75.

Proposed activities will require a minimum 15-year affordability period secured by deed restriction or forgivable lien. The affordability period will enforce LMI requirements and may limit rental charge increases. The State will comply with 24 CFR 1.4(b)(3) regarding site selection as well as 24 CFR 1.4(b)(2)(i) regarding the types of housing, facilities, accommodations, services, financial aid, or benefits that could subject individuals to discrimination, including voluntary buyouts.

### **Funding for Acquisitions and Refinancing**

Residents need access to low or no cost financing to transition to resident-owned communities thus ensuring long term, affordable lot rents. This includes short-term financing to secure the initial acquisition of the community (acquisition), financing for infrastructure improvements (construction), long-term (permanent financing), and other financing to bridge gaps in acquisition and first-position permanent financing (secondary financing).

Access to **deferred** loans helps residents compete more effectively against private buyers who leverage their own personal equity and low-interest rates to finance their acquisitions. In addition, the State will look to partner with nonprofit loan funds and Community Development Financial Institutions (CDFIs) that provide below-market financing products to cooperatives.

Out-of-state, speculative investors are increasingly buying manufactured housing communities as a high margin investment. Such investors seek to maximize profits through large rent increases, new resident fees, loss of amenities, and the institution of new rules, making manufactured home communities less affordable and livable for residents. Funding to incentivize manufactured housing community owners to sell to residents instead of out-of-state investors is urgently needed in Wisconsin.

Since 2015, more than 8,000 home sites have been sold to out-of-state buyers who purchased manufactured housing communities. The trend is accelerating more than four in five home sites sold in 2021 went to out of state buyers as out-of-state buyers purchased a record 2,300 home sites<sup>4</sup>.

Before residents can purchase their community, they must put up earnest money to secure a purchase agreement and pay for due diligence. Earnest money is typically 1-3% of the purchase price, while predevelopment expenses range from \$40,000 to \$75,000 depending on the size of the community. Funding to secure a purchase agreement is urgently needed in Wisconsin.

DEHCR will promote and ensure affordable homeownership and/or rental opportunities created will remain affordable

---

<sup>4</sup> North Country Foundation, "Manufactured Home Communities Preservation Toolbox"

for at least 15 years and be promoted to LMI households as well as protected classes via grant agreement. PRICE assistance will be limited to households at or below 80% County Median Income (CMI) and for activities such as infrastructure to manufactured home communities, a minimum of 51% of the residents must be 80% or less of the CMI. The affordability period will be enforced through deed restriction or lien.

### **Infrastructure Funding**

Many Wisconsin manufactured housing communities were built in the 1950s and 60s and have never replaced or upgraded their infrastructure, which is almost always privately owned and maintained. The cost of replacing old and failing infrastructure often exceeds the value of a community. PRICE grants are needed to replace manufactured home community infrastructure. Utilizing these funds, Wisconsin will develop dedicated grant programs to help MHC's improve infrastructure and community facilities.

### **Municipal Maintenance of Manufactured Housing Infrastructure**

Municipalities with existing manufactured home communities could replace failing infrastructure with city owned and operated infrastructure like traditional subdivisions. DEHCR will look to partner with UGLG's to provide incentives to municipalities who upgrade and integrate private MHC infrastructure into municipal systems, which would reduce the reliance on state grants over the long-term.

Because MHCs change owners over time and replacing infrastructure is expensive, MHC owners often avoid wholesale upgrades (leaving the task for a future owner) and opt for cheaper, superficial repairs. Converting private MHC infrastructure to public municipal infrastructure would solve the issue because municipalities have the mandate and resources to invest in regular infrastructure upgrades and maintenance.

### **Funding for Repair, Rehabilitation, and replacement of Manufactured Housing Units**

Manufactured homes in manufactured home communities are titled as personal property, making them ineligible for mortgage financing and most down payment assistance programs. Personal property loans are much more costly than mortgage loans with loan terms of 5 to 15 years and interest rates three to five percent higher than typical mortgage rates. With a small per-unit investment, many existing manufactured homes can be rehabilitated, extending the life of the home, improving the quality of life of the homeowners, and reducing homeowner energy cost burden. The biggest barriers homeowners face in completing home rehab projects is: 1) identifying qualified contractors who can help them assess and complete the rehab and, 2) funding the cost of the improvements.

Residents need access to financing to repair, rehabilitate or in limited circumstances, replace aging manufactured housing, including any pre-1976 mobile homes. This includes short-term financing to provide needed accessibility features to enable persons with disabilities to remain in their housing.

Repairs and energy efficiency improvements will provide a longer life for the manufactured home as well as added efficiencies, giving the homeowner the ability to remain in the home longer for a lowered total cost. The repairs and improvements may add value to the property and enable that particular owner to then sell the property to another low to moderate income owner creating another homeownership opportunity. The previous owner may be able to use any proceeds from the sale of the unit to purchase another home.

## **What protections will be in place for residents?**

For all acquisition and infrastructure projects, the State will ensure through sub-award agreement that in communities where the tenant of a manufactured housing unit rents the unit and/or the pad, the community will maintain or adopt tenant site lease protections consisting of the following examples:

- Notice of rent increases
- Renewable leasing structures
- Right to purchase or sell
- Right to sublease
- Advanced notice of planned sale or closure of a community

Through sub-award agreement, entities receiving PRICE funding from the State will protect residents from unreasonable lot rent and/or fee increases, relocation, eviction, paying arrearage, and other adverse actions. This may include, but is not limited to, updating local ordinances to protect residents of manufactured homes from eviction, informing them of their rights, providing housing or legal counseling, or land acquisition.

Through sub-award agreement, entities receiving PRICE funding from the State will protect residents by aligning with all federal and state civil rights laws, including the Fair Housing Act, Fannie Mae or Freddie Mac tenant protections, The White House Blueprint for a Renters Bill of Rights, as well as state, local, or Tribal laws, and regulations applicable to the community or communities being served.

## **How does your proposal encourage access to resources and financing, especially for underserved communities and persons?**

If awarded the PRICE grant, the state will award funds on a competitive basis to subrecipients that have ties to the local communities they serve. The subrecipients will have direct knowledge and experience in working with their communities, understand the demographics of the areas they serve, and are best equipped to ensure the underserved communities and people are targeted for this program. In addition to statewide outreach, subrecipients will be required to include in their proposals an outline of how they will target underserved persons and communities within their area, and if applicable, with an Affirmative Fair Housing Marketing Plan (AFHMP).

The State will also engage a team of community-based organizations located in the communities with high concentrations of eligible MHC residents. Agencies may be asked to host a series of in-person or on-line events to engage the public, including stakeholders with a vested interest in MHC-resident assistance. Emphasis will be placed on engaging public participation and impacted community members to help inform the policy development and ensure that partners are brought into the process to help deploy assistance once the PRICE funding is approved. All outreach materials and applications materials used will be available in multiple languages including English, Spanish, Somali and Hmong.

## **Environment and Resilience**

### **What significant hazards could impact your project site(s)?**

According to the State of Wisconsin Hazard Mitigation Plan, severe weather including tornadoes and high winds, hail, and lightning, flooding, wildfire, drought, and extreme heat as well as winter storms and extreme cold are the most significant hazards in the state. 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 2015 Wisconsin Critical Facilities Risk Assessment. Manufactured homes. Manufactured Housing Communities in Wisconsin have been disproportionately affected by hazard events due to location as well as inherent design.

### **How will your activities address the current and future threat of natural hazards, extreme weather, and disaster events?**

Low to moderate income owners too often are unable to afford property insurance or due to the low value of the structure, insurance coverage may be inadequate. When the owner experiences a loss, they may not be able to afford to fully repair the damage caused by the event. Left untreated, the damage becomes exacerbated and the condition of the home further deteriorates, creating an unsafe environment. For homes located within an MHC, there are little to no programs available to assist in essential repairs to the home. Unfortunately, many of these owners are financially unable to purchase a new home or to move to a new home.

PRICE Program requirements will encourage the construction of storm shelters and through a competitive grant competition, DEHCR will award extra points for projects that undertake the development/construction of storm shelters.



Projects that include acquisition, rehabilitation, or replacement of manufactured units will be required to have tie downs or a permanent foundation, thus reducing the risk of severe damage caused by heavy winds and tornados.

To the greatest extent possible, PRICE funds will not be used for projects located in a flood plain. Any projects located within the flood plain will be required to follow all federal, state, and local regulations as they apply to flood plains.

## How does your proposal help advance Environmental Justice (as defined in Section I.A.4 of this NOFO)?

The State of Wisconsin will prioritize MHCs located in Census tracts identified in the Climate and Economic Resilience Screening Tool for assistance. In addition, criteria used to screen applications will utilize examples of environmental justice factors and economic indicators, such as energy, health, legacy pollution, water/wastewater, and projected risk of floods or wildfires. The State will prioritize projects or activities that advance Environmental Justice for people or communities that have been environmentally underserved or overburdened (e.g., low-income, and Black and Brown communities). Relevant examples include:

- Reducing or mitigating exposure to environmental and health hazards (e.g., poor air quality, legacy pollution, heat islands, and soil contamination from current/former industrial areas).
- Improving protection from and resilience to environmental harms (e.g., weatherization, tornado shelters, fire-resistant materials, floodproofing).
- Expanding environmental benefits (e.g., clean air and water, public transportation, bike and walking paths, clean energy, green technology, biodiversity).
- Overcoming prior disinvestment in environmental infrastructure (e.g., drainage systems, green spaces, pollution controls).

## Community Engagement

### How will you seek and encourage diverse stakeholder participation?

The State of Wisconsin will seek to obtain, include, and use input from stakeholder organizations or groups impacted by the State's proposed activities. The State will partner with local agencies to obtain input from groups such as manufactured housing residents, local governments, nonprofits, CDFIs, cooperatives, tenant advocates, fair housing organizations, manufactured housing developers, builders/general contractors, and unions. The State of Wisconsin has successfully implemented the U.S. Department of Treasury, Homeowners Assistance Fund, which engaged and obtained support from underserved communities and groups least likely to participate in the community. By partnering with local stakeholder groups, the State was not only able to obtain support and engagement by these groups, but program participants were also heavily weighted towards underrepresented groups. Partner organizations are dedicated or will be contractually obligated to work with low-income families, and a significant number of these organizations will have physical offices located in majority-minority communities.

Outreach strategies may include but will not be limited to in person and virtual presentations at community centers, faith-based institutions, and other community-based facilities where targeted manufactured home dwellers are likely to be represented. All outreach materials and applications materials used by contracted agencies will be available in multiple languages including English, Spanish, Somali and Hmong.

The State will authorize a reasonable portion of the administrative budget to be dedicated to paid media, and to support direct mail and digital advertising. The effectiveness of these outreach and marketing efforts will be evaluated for efficacy at reaching qualified applicants under the PRICE program, especially efforts to identify and encourage low-to-moderate income and historically underserved households to apply.

In addition to paid media, the State and its partner agencies will launch and sustain a targeted social media campaign aimed at these same geographies, with an emphasis on targeting historically disadvantaged households for outreach

and awareness. Social media will be utilized in partnership with community-based leaders, faith-based leaders, and local elected officials to amplify the social media messaging through stakeholders who have direct ties to the impacted communities.

The State has scheduled a public hearing in compliance with the requirements set forth in the PRICE NOFO to solicit input on its application for PRICE Main funds. In the May 2, 2024, and May 9, 2024, issues of the Wisconsin State Journal, the State publicized the May 16, 2024, public hearing, in conformity with its existing citizen participation plan. The hearing was held in a facility that is accessible to persons with disabilities. The State publicized its ability to provide accommodations to persons with physical and other disabilities to allow full participation in the most integrated setting appropriate. In conformance with all applicable laws and regulations. All future notices and communications during all training sessions, public meetings and feedback sessions shall be provided in a manner consistent with all applicable federal regulations.

In addition, the State will take all reasonable steps to provide meaningful access to persons with Limited English Proficiency in regard to any program, activity, or service funded pursuant to the PRICE NOFO pursuant to Title VI of the Civil Rights Act of 1964.

## How does your proposal align with existing community plans and policies?

All funded projects and activities will align with applicable existing comprehensive plans, land use plans, housing plans, fair housing planning, or other plans or policies in the community or communities across the project area(s).

## CAPACITY

### What experience do you have managing projects?

As a state recipient of annual federal funding, the Division of Energy Housing and Community Resources (DEHCR) has extensive experience managing projects. Staff have experience managing varying Community Development Block Grant (CDBG) awards including public facilities, housing, planning, coronavirus, economic development and disaster recovery, Neighborhood Stabilization Program (NSP), and U.S. Treasury American Rescue Plan (ARPA) and Consolidated Appropriations Act, 2021 funds. One of the more recent programs staff have managed is U.S. Treasury funded, Homeowner Assistance Fund. Staff developed the program and administered the day-to-day responsibilities of the program. DEHCR program staff implemented eligibility standards, procured, and developed an online application portal to accept applications statewide, ensured funds were spent appropriately and timely, monitored agency performance, and maintained and reported program accomplishments as required by Treasury and also for the internal/external of stakeholder. The program has assisted over 9300 homeowners.

Staff have exercised responsibility with grant application development, review, and award, researching and interpreting federal, state, and local regulations, developing, and implementing training sessions, materials, and manuals. DEHCR has extensive experience interpreting and administering housing quality standards inspection, rehabilitation standards, and monitoring subrecipient progress towards program goals. DEHCR has collaborated with multiple organizations and individuals to create programs, ensure programs are operating effectively and efficiently, and to optimize outcomes.

### What is your experience using grant funds?

The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources is the State's designated recipient of HUD-administered formula funding including Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), Housing Opportunities for Persons With AIDS (HOPWA) and Housing Trust Fund (HTF) funding. In addition, the Division has recently completed its administration of Treasury-funded Emergency rental Assistance (ERA) funding and is close to finalizing its Homeowner Assistance Fund (HAF) program. Combined, these two programs provided over \$400 million in assistance funding for

renters and homeowners in need of assistance following the Coronavirus.

The Division has successfully administered multiple housing development and rehabilitation projects utilizing a variety of federal funding sources. The State has successfully met the obligation and expenditure requirements associated with the federal funding it has received and is in good standing with both HUD and Treasury.

## Who are your key staff?

The State of Wisconsin has assessed its staffing capacity and has determined it has sufficient capacity and experience to administer the PRICE award. Key staff members, particularly those in the financial management section, have prior experience with HUD and Treasury annual and one-time programs and will transition seamlessly into PRICE program positions with minimal training to expand understanding of program differences.

The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) has appointed the following staff who have demonstrated experience in housing, economic revitalization and infrastructure, project leadership, management, implementation, meeting national objectives, federal and state civil rights regulations, Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and its implementing regulations at 24 CFR part 75, conducting environmental reviews in accordance with 24 CFR part 58, fair housing compliance, procurement/contract management, environmental compliance, monitoring, quality assurance and financial management:

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

[David.Pawlisch@wisconsin.gov](mailto:David.Pawlisch@wisconsin.gov)

608-261-7538

Mr. Mark Staff, Director, Bureau of Community Development

[Mark.Staff@wisconsin.gov](mailto:Mark.Staff@wisconsin.gov)

608-266-7531

Ms. Tamra Fabian, Section Chief, Bureau of Community Development

[Tamra.Fabian@wisconsin.gov](mailto:Tamra.Fabian@wisconsin.gov)

608-261-7747

Mr. Landon Williams, Policy Initiatives Advisor, Division of Energy, Housing and Community Resources

[LandonT.Williams@wisconsin.gov](mailto:LandonT.Williams@wisconsin.gov)

608-267-9376

The State of Wisconsin has designated the Legislative Audit Bureau as the entity responsible for conducting internal audits of agency programs and reports independently to the legislature of the State of Wisconsin.

Legislative Audit Bureau  
22 East Mifflin St., Suite 500  
Madison, WI 53703

Additionally, the State of Wisconsin has designated the State Controller's Office, which reports to the Secretary of the Department of Administration, who is appointed by the Governor of the State of Wisconsin and is the entity responsible for annually producing the Comprehensive Annual Financial Report (CAFR) for the State of Wisconsin.

Ms. Angela C. Thomas, CPA, State Controller  
State Controller's Office  
101 East Wilson St.  
Madison, WI 53703

## What is your experience promoting racial equity?

The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources is the State's designated recipient of HUD-administered formula funding including Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), Housing Opportunities for Persons With AIDS (HOPWA) and Housing Trust Fund (HTF) funding. In addition, the Division has recently completed its administration of Treasury-funded Emergency rental Assistance (ERA) funding and is close to finalizing its Homeowner Assistance Fund (HTF) program. Combined, these two programs provided over \$400 million in assistance funding for renters and homeowners in need of assistance following the Coronavirus.

The Division has successfully promoted racial equity in creating awareness of, interest in, and creating access to a variety of federal funding sources from historically underserved residents. The State has successfully met and exceeded its goals to serve socially disadvantaged communities associated with the federal funding it has received from the Treasury. The State has experience using HMDA, ACS, and Federal Bank of Atlanta data to identify targeted areas with high rates of impacted Socially Disadvantaged homeowners.

DEHCR has contracted with non-profit housing counseling and legal services entities to provide services on a statewide basis. Contracted organizations were dedicated and contractually obligated to work with low-income families, and a significant number of these organizations had physical offices located in majority-minority communities.

Contracted agencies utilized a variety of outreach strategies including in person and virtual presentations at community centers, faith-based institutions, and other community-based facilities where targeted homeowners were likely to be represented. All outreach materials and applications materials used by contracted agencies were available in multiple languages including English, Spanish, Somali and Hmong.

The State authorized a dedicated paid media publicization campaign, including placing advertisements on tv, radio, print publications, as well as direct mail and digital advertising to targeted homeowners. The effectiveness of these outreach and marketing efforts were evaluated for efficacy at reaching qualified applicants under the WI HAF program. In its most recent analysis, the State exceeded its goals for funding Socially Disadvantaged households. Over 30% of the total funding was provided to Socially Disadvantaged households. In addition, households with an income of less than 50% of the CMI were the largest recipients of funding by share and number of recipients.

In addition to paid media, the State and its partner agencies launched and sustained a targeted social media campaign aimed at these same geographies. Social media was utilized in partnership with community-based leaders, faith-based leaders, and local elected officials to amplify the social media messaging through stakeholders who have direct ties to the targeted communities.

The State also contractually established a dedicated, well-staffed and multilingual homeowner hotline which was promoted in all paid and earned media communications. The hotline also served as a tool to connect homeowners to partner agencies if they need assistance with applying to the WI HAF.

The State also engaged a team of community-based organizations located in the communities with high concentrations of targeted homeowners. Members of Take Root Wisconsin agencies hosted a series of in-person or on-line events to engage the public, including stakeholders with a vested interest in homeowner assistance. Public participation and community engagement helped inform the plan proposal before it is sent to Treasury and ensured that partners are brought into the process to help deploy assistance once the plan is approved. All outreach materials and applications materials used will be available in multiple languages including English, Spanish, Somali and Hmong.

Additional information related to DEHCR's commitment to promoting racial equity may be found in Attachment A.

## What is your experience completing environmental reviews?

DEHCR has employed an Environmental Compliance Officer (ECO) to approve Community Development Block Grant

environmental reviews on HUD's behalf for over a decade. The ECO ensures that all aspects of 24 CFR parts 50 and 58 are in compliance. The ECO also provides training and assistance to grantees who complete environmental reviews for HUD-funded grants including Community Development Block Grant- Public Facilities, Housing, CARES Act, Disaster Recovery, Economic Development, Public Facilities for Economic Development, Planning, Emergency Assistance, Housing Trust Fund, and Special Projects. Grantees submit official, completed reviews to the ECO for certification. The ECO reviews all parts of the environmental review records including project classification, review, and public notice for accuracy and completeness, then certify, on HUD's behalf, that all requirements of 24 CFR parts 50 and 58 have been met. The ECO also works with other regulatory agencies to ensure access to environmental data is available in a user-friendly format that applicants understand and also works with HUD staff when any questions in procedure, process, or findings require additional clarification.

## Are you familiar with cross-cutting federal requirements?

As a recipient of federal awards, DEHCR program and fiscal staff are well trained and experienced in meeting federal requirements. DEHCR staff subscribe to HUD notices and also attend training and webinars on federal regulations, updates, and cross cutting requirements. The cross-cutting requirements are part of the DEHCR grant agreement boilerplate, with subrecipients. These requirements include (but are not limited to) Davis Bacon labor standards, fair housing, and non-discrimination requirements, Section 3, Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). DEHCR has created manuals, training materials and other resources to ensure that subrecipients understand all applicable requirements and their obligation to meet them.

All federal cross cutting requirements will be part of any grant agreement DEHCR signs with a subrecipient for PRICE funds. These requirements will be reviewed for compliance during the performance period of the agreement as well as all monitoring of the subrecipient.

Subrecipients must provide DEHCR staff with fair housing activities they will undertake during their performance period, and they must adopt the federal and state fair housing laws and statutes as part of their local ordinance.

DEHCR employs trained labor standards staff with over a decade of experience in navigating the complexity of Davis Bacon requirements. DEHCR administers several programs including CDBG public facilities that require Davis Bacon compliance. DEHCR provides annual training and develops training materials for subrecipients to ensure that all Davis Bacon requirements are met. As part of the monitoring and reporting process, subrecipients are required to provide necessary information to ensure Davis Bacon and other federal and state regulations are followed.

## LONG-TERM EFFECT

How will your proposed activities retain other affordable housing opportunities for LMI households in the community? How will you ensure LMI households are not eventually priced out of the community? How will you help current renters and homesite renters become homeowners or otherwise acquire an interest in the lot?

Acquisition financial assistance will assist residents of a manufactured housing community to purchase the MHC and become a resident owned community (ROC). The acquisition assistance will help reduce the residents' need to borrow funds for the acquisition which will result in lowered monthly costs for residents. Downpayment and financial assistance available to households to purchase a manufactured home, the land and/or the lot as well as necessary infrastructure improvements to place the home(s) on site. Any sale of the property will trigger repayment of the loan, unless sold to a cooperative and approved in advance by DEHCR.

PRICE funds used for infrastructure improvements will be provided as a grant. As these funds will not need to be repaid, the residents of the community should not see a large increase in their monthly costs to fund the infrastructure project.

Infrastructure projects will require a 15-year period of affordability to limit lot and rent increases and 51% of the lots available must be rented/sold to households with incomes at or below 80% CMI. Any sale of the property will trigger repayment of the loan, unless sold to a cooperative and approved in advance by DEHCR.

Financial assistance may be used to assist LMI households to purchase a manufactured home, lot, and make infrastructure improvements to ready the lot for final occupancy. A 15-year affordability period will be required in the form of a lien against the property. The restriction would limit the sale of the property to another LMI household during the affordability period.

## **How will your proposed activities ensure the long-term affordability, including lot rents and other fees as applicable, of housing without future federal subsidies?**

To ensure ongoing affordability, the program will require a deed restriction, lien, or mortgage against the property. Depending on the type of activity, the sale or transfer of the property will be restricted to a buyer whose annual household income is 80% or less (LMI) of the county median income. If the property is not sold to an LMI buyer, the PRICE funds will need to be repaid. Activities that include conversion to a resident owned community or infrastructure improvements to an MHC will require that 51% of the residents are LMI and will also include restrictions of increases and sale of the property during the affordability period of 15 years.

## **How will your proposed activities promote stable homeownership options in the long-term, including both the house itself and the lot on which it sits?**

Needed repairs and energy efficiency improvements will provide a longer life for the manufactured unit, giving the homeowner the ability to remain in the home longer. Additionally, this may add value to the property and enable that particular owner to then sell the property to another low to moderate income owner creating another homeowner opportunity. The previous owner may be able to use any proceeds from the sale of the unit to purchase another home. A forgivable lien against the property ensuring that the sale of the property to an LMI household during the affordability may/will be required.

Down payment assistance can be used to assist LMI households in purchasing a lot and/or a manufactured unit that is located or will be located within an MHC to create an affordable monthly payment. Assistance will be in the form of a forgivable lien for funds used for to purchase. Recipients must agree to a 15-year affordability period, with the property only transferable to other LMI households within the affordability period.

Infrastructure repairs and acquisition will require both a 15-year affordability period, and that 51% of the MHC occupants are LMI. Lot rent restrictions may also be used for the affordability period. MHC's that become resident owned offer protections as against unaffordable rent increases, unfair evictions, and the sale or closure of the community. Resident owned communities have the control to vote on issues that impact the community such as repairs and improvements and the cost and the control of fees. Financing may be more affordable for the community members as the land is owned by the community and not a third party. Overall, the activities will lead to the creation or retention of affordable housing opportunities, an increase in home ownership, higher standard of living, and the safety and security that homeownership can provide.

## **How will your proposal support underserved communities in the long term? How will your proposed activities advance housing access and justice for vulnerable populations or underserved communities? How will your proposal enable underserved communities, particularly those of color, to build wealth over the long term?**

The State of Wisconsin proposes a grant program to fund infrastructure improvements, the acquisition of manufactured home parks, and manufactured home repair, rehabilitation, and replacement. The program will address the long-term

needs of aging manufactured home communities throughout the state and prioritizes projects based on income, health, safety, and critical need improvements. The program also prioritizes projects that leverage support from local municipalities or projects converting a community to a cooperative ownership model. Assistance is limited to households at or below 80% County Median Income (CMI) and for activities such as infrastructure to manufactured home communities, 51% of the residents must be 80% or less of the CMI.

The State of Wisconsin, utilizing PRICE funding, intends to include the following activities in its' grant application:

1. Development or repair of infrastructure to support manufactured housing communities and home ownership opportunities. \$10 million allocated to this goal.
2. Repair, rehab, and replacement of manufactured units. Also includes accessibility features (ramps, etc.) \$5 million allocated to this goal.
3. Acquisition and down payment assistance. These funds may be used to assist residents of a manufactured home community to purchase the community therefore transferring ownership from privately owned community to resident owned. Down payment assistance may also be used to assist individuals to purchase a manufactured home to be placed within a manufactured home community or to assist in the purchase of a manufactured home already located in the community. \$15 million allocated to this goal.

Total budget: \$30 million. Includes up to a total maximum of 10% for grantee administrative costs.

The Division has successfully supported underserved communities' awareness of, interest in, and created access to a variety of federal funding sources. The Division plans to enact activities to advance housing access and justice for vulnerable populations or underserved communities. The funded activities will enable underserved communities, particularly those of color, to build wealth over the long term.

If awarded PRICE funding, the State will build upon past successes in meeting and exceeding its goals to serve socially disadvantaged communities associated with the federal funding it has received from the Treasury. The State has experience using HMDA, ACS, and Federal Bank of Atlanta data to identify targeted areas with high rates of impacted Socially Disadvantaged homeowners.

Utilizing PRICE funds, DEHCR will utilize dedicated and contractually obligated organizations to work with low-income families, and a significant number of these organizations will have physical offices located in majority-minority communities.

Utilizing PRICE funds, contracted agencies will employ a variety of outreach strategies including in person and virtual presentations at community centers, faith-based institutions, and other community-based facilities where targeted MHC residents are likely to be represented. All outreach materials and applications materials used by contracted agencies would be available in multiple languages including English, Spanish, Somali and Hmong.

The State would also employ a dedicated paid media publicization campaign, as well as direct mail and digital advertising to targeted MHC residents. The effectiveness of these outreach and marketing efforts will be evaluated for efficacy at reaching qualified applicants under the PRICE program.

In addition to paid media, the State and its partner agencies will launch and sustain a targeted social media campaign aimed at reaching low-to-moderate-income MHC residents. Social media may be utilized in partnership with community-based leaders, faith-based leaders, and local elected officials to amplify the social media messaging through stakeholders who have direct ties to the targeted communities.

The State may also contractually establish a dedicated, well-staffed and multilingual hotline which will also be promoted in all paid and earned media communications. The hotline would serve as a tool to connect eligible MHC residents to partner agencies if they need assistance with applying for PRICE funds.

The State will also engage a team of community-based organizations located in the communities with high

concentrations of eligible MHC residents. Agencies may be asked to host a series of in-person or on-line events to engage the public, including stakeholders with a vested interest in MHC-resident assistance. Emphasis will be placed on engaging public participation and impacted community members to help inform the policy development and ensure that partners are brought into the process to help deploy assistance once the PRICE funding is approved. All outreach materials and applications materials used will be available in multiple languages including English, Spanish, Somali and Hmong.

**How will your proposal make manufactured housing or MHCs livable, sustainable, and resilient? Examples may include, but are not limited to, long-term benefits of mitigation activities, weatherization, or infrastructure enhancement in MHCs. You may also describe how your proposal reduces resident health risks or exposure to environmental hazards.**

The State of Wisconsin, utilizing PRICE funding, intends to include the following activities in its' grant application:

1. Development or repair of infrastructure to support manufactured housing communities and home ownership opportunities. \$10 million allocated to this goal.
2. Repair, rehab, and replacement of manufactured units. Also includes accessibility features (ramps, etc.) \$5 million allocated to this goal.
3. Acquisition and down payment assistance. These funds may be used to assist residents of a manufactured home community to purchase the community therefore transferring ownership from privately owned community to resident owned. Down payment assistance may also be used to assist individuals to purchase a manufactured home to be placed within a manufactured home community or to assist in the purchase of a manufactured home already located in the community. \$15 million allocated to this goal.

Total budget: \$30 million. Includes up to a total maximum of 10% for grantee administrative costs.

Housing affordability in the State of Wisconsin, much like the rest of the nation, is reaching crisis levels. As a result, manufactured housing is garnering more interest as an important source of affordable housing, particularly within rural areas and housing low-moderate-income households. Manufactured housing also costs significantly less and takes significantly less time to build than to build a new site-built home. Not surprisingly, manufactured housing has the potential to be an important tool in adding new homes to the housing supply in Wisconsin.

Nationwide, the median annual household income of manufactured home residents who own their homes is about \$35,000, half of the median annual income of site-built homeowners. Over one-quarter of manufactured homeowners earn less than \$20,000 annually and two-thirds earn less than \$50,000 annually. By contrast, about a third of site-built homeowners earn less than \$50,000 annually.<sup>5</sup>

While the distribution of renter household incomes skews lower in all types of housing, manufactured home rentals are particularly important to lower-income renters. Over one-third of renters of manufactured homes earn less than \$20,000 per year and over three-quarters earn less than \$50,000 per year. The median monthly all-in cost to own or rent a manufactured home is lower than for a site-built home. The median all-in monthly housing cost of \$925 per month for manufactured homeowners was \$675 per month less than that paid by owners of site-built homes. The all-in cost was \$350 per month less for renters of manufactured homes.<sup>6</sup>

Wisconsin has 84,592 units of manufactured housing units in 1,235 MHC's. The residents of these communities are under increasing risk of losing their affordability due to investors buying up communities and raising rents. Residents are

---

<sup>5</sup> Fannie Mae, "Manufactured Housing Landscape 2020"

<sup>6</sup> Fannie Mae, "Manufactured Housing Landscape 2020"



also at risk of outright closure of their communities due to failure of the property's private infrastructure systems. The State will balance affordability with the opportunity to build financial security and wealth for manufactured homeowners and if applicable, will encourage lot ownership for the siting of manufactured homes. The State will prioritize access to funds for MHCs with high rates of poverty, living in overcrowded homes and located in historically underserved areas or housing historically underserved populations. Projects receiving funding will increase accessible and affordable housing opportunities for individuals with disabilities and participants will be provided with opportunities for integrated and independent living with access to voluntary supportive services such as health services and transportation. Lastly, funded projects will make the communities in which they are located more livable, sustainable, and resilient.

Residents need access to low or no cost financing to transition to resident-owned communities thus ensuring long term, affordable lot rents. This includes short-term financing to secure the initial acquisition of the community (acquisition), financing for infrastructure improvements (construction), long-term (permanent financing), and other financing to bridge gaps in acquisition and first-position permanent financing (secondary financing).

Access to deferred loans helps residents compete more effectively against private buyers who leverage their own personal equity and low-interest rates to finance their acquisitions. In addition, the State will look to partner with nonprofit loan funds and Community Development Financial Institutions (CDFIs) that provide below-market financing products to cooperatives.

Out-of-state, speculative investors are increasingly buying manufactured housing communities as a high margin investment. Such investors seek to maximize profits through large rent increases, new resident fees, loss of amenities, and the institution of new rules, making manufactured home communities less affordable and livable for residents. Funding to incentivize manufactured housing community owners to sell to residents instead of out-of-state investors is urgently needed in Wisconsin.

DEHCR will promote and ensure affordable homeownership and/or rental opportunities created will remain affordable for at least 15 years and be promoted to LMI households as well as protected classes via grant agreement. PRICE assistance will be limited to households at or below 80% County Median Income (CMI) and for activities such as infrastructure to manufactured home communities, a minimum of 51% of the residents must be 80% or less of the CMI.

Many Wisconsin manufactured housing communities were built in the 1950s and 60s and have never replaced or upgraded their infrastructure, which is almost always privately owned and maintained. The cost of replacing old and failing infrastructure often exceeds the value of a community. PRICE grants are needed to replace manufactured home community infrastructure. Utilizing these funds, Wisconsin will develop dedicated grant programs to help MHC's improve infrastructure and community facilities. Municipalities with existing manufactured home communities could replace failing infrastructure with city owned and operated infrastructure like traditional subdivisions. DEHCR will look to partner with UGLG's to provide incentives to municipalities who upgrade and integrate private MHC infrastructure into municipal systems, which would reduce the reliance on state grants over the long-term. Infrastructure funded projects will make the communities in which they are located more livable, sustainable, and resilient.



Division of Energy, Housing and Community Resources

# ADVANCING RACIAL EQUITY

Attachment A – State of Wisconsin PRICE-Main  
Application

## **ADVANCING RACIAL EQUITY - PRICE MAIN COMPETITION**

---

As an addendum to the Affirmative Fair Housing Marketing Plan (AFHMP) requirement for all acquisition and infrastructure awards exceeding \$1,000,000, grantees shall demonstrate meaningful efforts to analyze the racial and socioeconomic composition of persons or households who may benefit from a project and identify ways that they will reduce barriers to entry for those persons or households.

This policy was developed to address HUD's advancing racial equity requirement for the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main application.

### **BACKGROUND**

In accordance with Executive Order 13985, Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and federal fair housing and civil rights laws, grantees for all acquisition and infrastructure awards exceeding \$1,000,000 need to analyze their current demographics and the socioeconomic status of their manufactured home communities to reduce barriers to entry for underserved groups.

### **WHAT IS AFFIRMATIVE MARKETING?**

An AFHMP is a marketing and outreach plan that housing providers use to strategize how they will target outreach to minority groups in their local community that are least likely to apply for housing opportunities. AFHMPs help to undo the effects of past federally sanctioned discrimination in housing, while helping to prevent unlawful discrimination against protected classes in current housing transactions (rental and home sales).

The goal is to:

“Achieve a condition in which individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, religion, sex, handicap, familial status or national origin. Each applicant for participation in FHA subsidized and unsubsidized housing programs shall pursue affirmative fair housing marketing policies in soliciting buyers and tenants, in determining their eligibility, and in concluding sales and rental transactions.” (24 CFR 200.610)

Affirmative Marketing should demonstrate the efforts of the owner/agent to reach underserved populations through community contacts and other direct methods of advertising.

- Direct efforts may be advertising in minority or specialized publications that can reach targeted populations i.e., magazine, newspaper, radio or television or relationships with organizations, churches, agencies, or businesses who work directly with an underserved population.
- Consider the use of alternate advertising formats i.e., by translating advertising in a language used by a minority population then distributing to businesses or organizations that can help reach a targeted group locate housing, providing alternate formats i.e., braille, large print, audio tapes, etc.
- Periodically review the special marketing efforts and evaluate successes and failures. Determine how to expand on the successes or make changes in areas that need improvement.

### **AFHMP REGULATIONS**

The regulations can be found in Title 24 Housing and Urban Development, Part 200-Introduction to FHA Programs, Subpart M—Affirmative Fair Housing Marketing Regulations.

<https://www.ecfr.gov/current/title-24/part-200/subpart-m>

**HOUSING PROTECTED CLASSES:**

<b>Federal</b>	<b>State</b>
Color	Marital Status
Race	Sexual Orientation
Sex	Victim of Domestic Abuse, Sexual Assault, or Stalking
National Origin	Age
Religion	Lawful Source of Income
Disability	
Familial Status	

Federal HUD requirements and Local protected classes may expand this list.

**WHAT FORM DO I USE?**

Owners/agents/developers complete the HUD AFHMP form 90 days prior to beginning any marketing. All completed information should be submitted to the local HUD office.

There are the following HUD Forms by property type:

<b>Property Type</b>	<b>HUD Form</b>
Multifamily and manufactured home parks (5+ lots/units/spaces)	HUD-935.2A
Single family	HUD-935.2B
Condominiums or cooperatives	HUD-935.2C

**What areas need to be addressed in an AFHMP?**

There are four main components to focus on when creating an inclusive AFHMP. As an AFHMP is reflective of its local community, careful research should be done into its demographic makeup as well as potential community partners for publicizing your housing opportunities. Use your findings to set internal goals for the demographics of applicants for your housing; so, you can evaluate how effective your AFHMP is. Also, ensure staff are appropriately trained so they understand how to carry out the plan.

- i. **Targeting.** Identify the demographic groups least likely to apply for housing.
- ii. **Outreach.** Demonstrate meaningful outreach attempts to ensure these demographic groups know how to access housing opportunities (e.g., publication advertisements, church partnerships).
- iii. **Indicators.** Evaluate success of the marketing plan in attracting housing applicants who are:
  - Underrepresented in the housing market where housing programs exist,
  - Individuals with disabilities,
  - Families with children, or
  - Other members of the federally protected classes
- iv. **Staff training.** Identify who is responsible for fair housing in your organization and provide additional written and oral training in Federal, State, and local fair housing laws. Staff should understand and practice the purpose and objectives of the AFHMP and how to perform outreach and select applicants.

**What are other AFHMP requirements?**

Aside from the completion and submission of the HUD AFHMP form, owners/developers are required to perform other activities to fulfill HUD’s marketing and advertising policies:

- All advertising shall include either the HUD-approved Equal Housing Opportunity logo or slogan or the Equal Housing Opportunity statement: “We are pledged to the letter and spirit of U.S. policy for the achievement of equal housing opportunity throughout the Nation. We encourage and support an

affirmative advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion, sex, or national origin.” (24 CFR 200.620(f)).

- Prominently display in all offices in which sale or rental activity pertaining to the project or subdivision takes place and include in any printed material used in connection with sales or rentals.
- All advertising depicting persons shall depict people of majority and minority groups, including both sexes.
- Maintain a nondiscriminatory hiring policy in recruiting from both minority and majority groups, including both sexes and the handicapped, for staff engaged in the sale or rental of properties.
- Specifically solicit eligible buyers or tenants reported to the applicant by the Area or Insuring Office.
- At least 90 days prior to beginning marketing again, owners/developers must submit the Notification of Intent to Begin Marketing to the local HUD office.
- The AFHMP must be made available for public access on the property after the plan has been approved by HUD.

### **When does the AFHMP need to be revised?**

An affirmative marketing program shall be in effect for each multifamily project throughout the life of the mortgage. It will need to be renewed every 5 years with the new Consolidated Plan or when there are significant demographic changes to the target area that will affect who should be considered the least likely to apply.

### **What are common compliance issues?**

The list below includes common AFHMP compliance issues. Avoid these issues to ensure AFHMP is approved quicker by HUD so marketing activities can begin for your property in a timely manner.

- Incomplete information (e.g., missing the number or price of units or the housing market area)
- Insufficient research into the demographic makeup of the local community to identify which specific groups are least likely to apply (e.g., all ethnic groups are listed on the HUD AFHMP form as “least likely to apply”)
- Failure to advertise in places used by people who have been deemed “least likely to apply”
- Lack of follow-up with community contacts to ensure the housing opportunities have been advertised
- No standards to evaluate if the AFHM Plan was effective
- More training needed for staff on fair housing laws

### **Advancing Racial Equity Addendum Requirements**

For all acquisition and infrastructure awards exceeding \$1,000,000, grantees shall demonstrate meaningful efforts to analyze the racial and socioeconomic composition of persons or households who may benefit from a project and identify ways that they will reduce barriers to entry for those persons or households. This includes a narrative demonstrating the following:

- You analyzed the racial composition of the persons or households who are expected to benefit from your proposed grant activities;
- You identified any potential barriers to persons or communities of color equitably benefiting from your proposed grant activities;
- You detailed the steps you will take to prevent, reduce or eliminate these barriers; and
- You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities.

This narrative shall be included with the applicable form and sent to both DEHCR as well as HUD for review.

The racial and socioeconomic composition of the persons or households who are expected to benefit from the award should be documented. Examples of identified potential barriers for participation by protected classes could be lack of engagement by protected classes or the project does not benefit segregated areas. Steps that

might reduce those barriers could include efforts to promote broad participation at meetings and relocation planning that minimizes disruption to affected residents. If the grantee does not identify any potential barriers to persons or communities of color equitably benefitting from the proposed grant activities, then the grantee should state that there are no reasonably identifiable potential barriers and do not need to detail steps to reduce barriers. Grantees must ensure persons and communities of color are equitably benefitting from these activities.



Division of Energy, Housing and Community Resources

# AFFIRMATIVELY FURTHERING FAIR HOUSING MARKETING PLAN (AFFHMP) GUIDE

Appendix A – State of Wisconsin PRICE-Main  
Application

# **AFFIRMATIVE FAIR HOUSING - MARKETING PLAN (AFHMP) POLICY**

---

## **INTRODUCTION**

Affirmative Fair Housing Marketing Plan (AFHMP) should demonstrate meaningful efforts to identify and attract underserved populations in the housing market area. Underserved populations may not apply for housing without special outreach efforts.

This guide was developed to assist a recipient in developing or updating an Affirmative Fair Housing Marketing Plan (AFHMP) as required by HUD for National Housing Trust Fund projects or Preservation and Reinvestment Initiative for Community Enhancement (PRICE) projects.

## **BACKGROUND**

HUD implemented Affirmative Fair Housing Marketing Plans to prevent redlining in communities (segregating race or ethnicity in defined housing areas). Properties need to make efforts beyond their normal or current advertising to directly reach and successfully attract underserved populations to increase diversity. The affirmative marketing plan should strive to house both majority and minority populations represented in the housing market area thus ensuring that segregation/redlining does not intentionally occur.

## **WHAT IS AFFIRMATIVE MARKETING?**

An AFHMP is a marketing and outreach plan that housing providers use to strategize how they will target outreach to minority groups in their local community that are least likely to apply for housing opportunities. AFHMPs help to undo the effects of past federally sanctioned discrimination in housing, while helping to prevent unlawful discrimination against protected classes in current housing transactions (rental and home sales).

The goal is to:

“achieve a condition in which individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, religion, sex, handicap, familial status or national origin. Each applicant for participation in FHA subsidized and unsubsidized housing programs shall pursue affirmative fair housing marketing policies in soliciting buyers and tenants, in determining their eligibility, and in concluding sales and rental transactions.” (24 CFR 200.610)

Affirmative Marketing should demonstrate the efforts of the owner/agent to reach underserved populations through community contacts and other direct methods of advertising.

- Direct efforts may be advertising in minority or specialized publications that can reach targeted populations i.e., magazine, newspaper, radio or television or relationships with organizations, churches, agencies, or businesses who work directly with an underserved population.
- Consider the use of alternate advertising formats i.e., by translating advertising in a language used by a minority population then distributing to businesses or organizations that can help reach a targeted group locate housing, providing alternate formats i.e., braille, large print, audio tapes, etc.
- Periodically review the special marketing efforts and evaluate successes and failures. Determine how to expand on the successes or make changes in areas that need improvement.

## **AFHMP REGULATIONS**

The regulations can be found in Title 24 Housing and Urban Development, Part 200-Introduction to FHA Programs, Subpart M—Affirmative Fair Housing Marketing Regulations.

<https://www.ecfr.gov/current/title-24/part-200/subpart-m>



## WISCONSIN PRICE & NATIONAL HOUSING TRUST FUND PROGRAMS

Projects that have received HUD funding (PRICE funds or National Housing Trust Fund) are required to provide an AFHMP. All programs follow the requirements at HUD Subpart M, CFR24 Part 200.620.

The AFHMP for multifamily rental projects should be reviewed every five years by pulling current area demographics, comparing them with current resident percentages then describing successes and/or failures with community contacts and marketing methods.

## HOW DO AFHMP'S RELATE TO THE FAIR HOUSING ACT?

The Fair Housing Act provides federal protection to ensure everyone has equal access to housing and prohibits discrimination against protected classes. The AFHMP specifically speaks to Section 808(e)(5) of the Fair Housing Act to "administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter".

The AFHMP furthers the Fair Housing Act by specifically targeting marketing activities toward minority groups within the local community who are least likely to know of or apply for the housing. Those minority groups may not be recognized as minorities nationwide, but the AFHMP is targeted towards whoever represents a minority within the community.

## HOUSING PROTECTED CLASSES:

<b>Federal</b>	<b>State</b>
Color	Marital Status
Race	Sexual Orientation
Sex	Victim of Domestic Abuse, Sexual Assault, or Stalking
National Origin	Age
Religion	Lawful Source of Income
Disability	
Familial Status	

Federal HUD requirements and Local protected classes may expand this list.

## WHAT FORM DO I USE?

Owners/agents/developers complete the HUD AFHMP form 90 days prior to beginning any marketing. All completed information should be submitted to the local HUD office.

There are the following HUD Forms by property type:

<b>Property Type</b>	<b>HUD Form</b>
Multifamily and manufactured home parks (5+ lots/units/spaces)	HUD-935.2A
Single family	HUD-935.2B
Condominiums or cooperatives	HUD-935.2C

## What areas need to be addressed in an AFHMP?

There are four main components to focus on when creating an inclusive AFHMP. As an AFHMP is reflective of its local community, careful research should be done into its demographic makeup as well as potential community partners for publicizing your housing opportunities. Use your findings to set internal goals for the demographics of applicants for your housing; so, you can evaluate how effective your AFHMP is. Also, ensure staff are appropriately trained so they understand how to carry out the plan.

- i. **Targeting.** Identify the demographic groups least likely to apply for housing.
- ii. **Outreach.** Demonstrate meaningful outreach attempts to ensure these demographic groups know how to access housing opportunities (e.g., publication advertisements, church partnerships).
- iii. **Indicators.** Evaluate success of the marketing plan in attracting housing applicants who are:
  - Underrepresented in the housing market where housing programs exist,
  - Individuals with disabilities,
  - Families with children, or
  - Other members of the federally protected classes
- iv. **Staff training.** Identify who is responsible for fair housing in your organization and provide additional written and oral training in Federal, State, and local fair housing laws. Staff should understand and practice the purpose and objectives of the AFHMP and how to perform outreach and select applicants.

## What are other AFHMP requirements?

Aside from the completion and submission of the HUD AFHMP form, owners/developers are required to perform other activities to fulfill HUD's marketing and advertising policies:

- All advertising shall include either the HUD-approved Equal Housing Opportunity logo or slogan or the Equal Housing Opportunity statement: "We are pledged to the letter and spirit of U.S. policy for the achievement of equal housing opportunity throughout the Nation. We encourage and support an affirmative advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion, sex, or national origin." (24 CFR 200.620(f)).
  - Prominently display in all offices in which sale or rental activity pertaining to the project or subdivision takes place and include in any printed material used in connection with sales or rentals.
- All advertising depicting persons shall depict people of majority and minority groups, including both sexes.
- Maintain a nondiscriminatory hiring policy in recruiting from both minority and majority groups, including both sexes and the handicapped, for staff engaged in the sale or rental of properties.
- Specifically solicit eligible buyers or tenants reported to the applicant by the Area or Insuring Office.
- At least 90 days prior to beginning marketing again, owners/developers must submit the Notification of Intent to Begin Marketing to the local HUD office.
- The AFHMP must be made available for public access on the property after the plan has been approved by HUD.

## When does the AFHMP need to be revised?

An affirmative marketing program shall be in effect for each multifamily project throughout the life of the mortgage. It will need to be renewed every 5 years with the new Consolidated Plan or when there are significant demographic changes to the target area that will affect who should be considered the least likely to apply.

## What are common compliance issues?

The list below includes common AFHMP compliance issues. Avoid these issues to ensure AFHMP is approved quicker by HUD so marketing activities can begin for your property in a timely manner.

- Incomplete information (e.g., missing the number or price of units or the housing market area)

- Insufficient research into the demographic makeup of the local community to identify which specific groups are least likely to apply (e.g., all ethnic groups are listed on the HUD AFHMP form as “least likely to apply”)
- Failure to advertise in places used by people who have been deemed “least likely to apply”
- Lack of follow-up with community contacts to ensure the housing opportunities have been advertised
- No standards to evaluate if the AFHM Plan was effective
- More training needed for staff on fair housing laws

**What are the penalties for non-compliance?**

Owners/agents/developers that do not comply with AFHMP policies may be denied further participation in HUD programs and referred to the U.S. Department of Justice for suit by the United States for injunctive or other appropriate relief.

**Additional Resources**

AFHMP Topics	Resources
HUD AFHMP Requirements	<a href="#">AFHMP Regulatory Guidance</a>
AFHMP Best Practice Guidance	<a href="#">Texas Department of Housing and Community Affairs</a>
	<a href="#">Ohio Finance Agency</a>
	<a href="#">Iowa Finance Agency</a>
Guidance on Completing an AFHMP	<a href="#">How to Create an Affirmative Fair Housing Marketing Plan</a> (Video)
	<a href="#">Getting Census Data for the AFHMP</a> (Video)
HUD Advertising Guidance	<a href="#">HUD Fair Housing Act Advertising Guidelines</a>
	<a href="#">Memorandum on Guidance Regarding Advertisements Under § 804(c) of the Fair Housing Act</a>
	<a href="#">HUD-approved Outreach Materials and Posters</a>
	<a href="#">HUD’s Fair Housing Marketing Handbook</a>



Division of Energy, Housing and Community Resources

# AFFIRMATIVELY FURTHERING FAIR HOUSING

Attachment C – State of Wisconsin PRICE-Main  
Application

## **AFFIRMATIVELY FURTHERING FAIR HOUSING - PRICE MAIN**

---

This policy was developed to address HUD's Affirmatively Furthering Fair Housing (AFFH) requirement for the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main application. These principles will also be followed as the State develops its 2025-2029 Consolidated Plan.

### **BACKGROUND**

Discriminatory government policies, exclusionary tactics, and disparate treatment have long been key components of the housing system and have encouraged housing inequality based on race. For decades, systemic redlining, restrictive covenants in private land sales, and residential segregation restricted many groups, particularly communities of color, from accessing opportunity and meaningful fair housing choice.

Past and present discriminatory policies and practices, including long-term disinvestment, have resulted in neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems. In addition, governmental policies have subsidized the development of segregated, high-resourced suburbs in metropolitan areas by constructing new highway systems—often through lower income communities of color—to ensure access to job opportunities in urban centers. This physical and policy infrastructure supports patterns of discrimination and high levels of segregation that continue to persist in Wisconsin and across the country.

To remedy the systemic segregation in housing, Congress established the Fair Housing Act in 1968 to prohibit discrimination in the sale, rental, and financing of housing based on race, religion, and national origin. Over time the law expanded its protections to include discrimination based on sex, disability, and familial status. The law also introduced the need to go beyond just prohibiting discrimination to instead affirmatively creating real housing choice by affirmatively furthering fair housing.

However, while federal mandates prohibited overt forms of housing discrimination, residential segregation has remained through the use of more subtle, discriminatory methods that reinforce patterns of segregation that persist in Wisconsin today despite the long-standing federal mandate, established by the Fair Housing Act of 1968 (FHA), that federal agencies and federal grantees affirmatively further the purposes of the FHA.

### **WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING?**

Existing federal law requires departments and agencies to administer programs relating to housing in a way that affirmatively furthers fair housing.<sup>1</sup> These obligations extend to state and local governments that receive funds or contract with the federal government. A state or local government receiving Community Development Block Grant (CDBG) dollars directly from the federal government is obligated to affirmatively further fair housing; under federal law this included completing an assessment of fair housing to inform the consolidated plan. However, federal planning requirements are subject to shifting promulgation of laws through various mechanisms such as regulations, rules, and program guidelines.<sup>2</sup>

### **COMPONENTS OF THE STATE OF WISCONSIN'S PLAN TO AFFIRMATIVELY FURTHER FAIR HOUSING**

#### **1. Outreach**

Outreach plans should consider geographic barriers to participation, especially in geographically extensive jurisdictions and rural areas, and should plan to hold in-person meetings in various locations to ensure residents from across the jurisdiction have the opportunity to participate.

---

<sup>1</sup> See Executive Order 12892 – Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing. January 17, 1994.

<sup>2</sup> Effective September 8, 2020, HUD replaced the final AFFH rule with the Preserving Community and Neighborhood Choice rule [federalregister.gov]. Under the new rule entities are not required to complete a fair housing assessment (AFH or AI). They must AFFH, which has been redefined to read as, “means to take any action rationally related to promoting any attribute or attributes of fair housing as defined in the preceding subsection” (24 C.F.R. §5.150 (2020)).

<sup>3</sup>Jurisdictions should seek sites that are transit-accessible and/or consider options to assist residents without vehicle access with transportation. Meetings should be held outside of work hours, including on evenings and weekends, to facilitate participation. Drafts of the housing element should be made available to the public for review and comment with ample time before submission to the Department of Housing and Community Development (HCD) for review. In-person and electronic options for participation should also be made available.

**2. Assessment of Fair Housing: Summary of Issues and Analysis of Patterns, Trends, and Disproportionate Housing Needs**

The housing element now incorporates planning and analysis which is collectively referred to as an assessment of fair housing which generally includes: <sup>4</sup>

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and outreach capacity; and
- An analysis and summary of fair housing issues utilizing available federal, state, and local data and knowledge. The analysis may include a variety of factors, such as trends and patterns within the locality and in comparison to the broader region, and the analysis may address:
  - » Integration and segregation;
  - » Disparities in access to opportunity, including for persons with disabilities; and
  - » Disproportionate housing needs (this may include things like overpayment, overcrowding, housing conditions disproportionately affecting protected classes), including displacement risk.

**3. Identification and Prioritization of Contributing Factors**

The State will incorporate a housing needs assessment, housing needs of persons with special needs, housing conditions, potential governmental and non-governmental constraints, and a site inventory to accommodate the projected housing needs of targeted groups.<sup>5</sup>

**4. Goals and Actions**

The State may address various statutorily mandated areas, such as the identification of adequate sites, zoning for a variety of types, assisting development for lower and moderate income households, addressing governmental and non-governmental constraints, conserving the existing housing stock, preserving at-risk units, and promoting housing opportunities for all people. The State will also include actions that promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons.

**HOUSING PROTECTED CLASSES:**

<b>Federal</b>	<b>State</b>
Color	Marital Status
Race	Sexual Orientation
Sex	Victim of Domestic Abuse, Sexual Assault, or Stalking
National Origin	Age
Religion	Lawful Source of Income
Disability	
Familial Status	

Federal HUD requirements and Local protected classes may expand this list.

<sup>3</sup> In recognition of the time sensitive nature of its application for PRICE funds coupled with HUD’s requirement to hold one public hearing, the State will not incorporate multiple public hearings for its PRICE Main application.

<sup>4</sup> For its PRICE Main application, the State will utilize its existing Analysis of Impediments to Housing Choice (AI) coupled with data included in the application narrative to satisfy this requirement.

<sup>5</sup> For its PRICE Main application, the State will utilize its existing Analysis of Impediments to Housing Choice (AI) coupled with data included in the application narrative to satisfy this requirement.

# Grant Application Detailed Budget Worksheet

OMB Number 2501-0044  
Expiration: 2/28/2027

**Applicant Name:** Wisconsin Department of Administration - DEHCR  
**Applicant Address:** 101 E Wilson Street  
Madison, WI 53707

Category				Detailed Description of Budget (for full grant period)							
	Estimated Hours	Rate per Hour	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>1. Personnel (Direct Labor)</b>											
Position or Individual											
Division Administrator	520	\$64.57	\$33,576	\$33,576							
Deputy Administrator	520	\$61.59	\$32,025	\$32,025							
Policy Initiatives Adv	520	\$54.11	\$28,138	\$28,138							
Fiscal Section Chief	520	\$47.73	\$24,819	\$24,819							
Budget & Policy Analyst	1,040	\$42.82	\$44,537	\$44,537							
Financial Specialist	1,040	\$32.95	\$34,266	\$34,266							
Bureau Director	1,040	\$56.32	\$58,572	\$58,572							
Section Chief	1,560	\$47.66	\$74,342	\$74,342							
Grant Specialist	5,200	\$36.76	\$191,155	\$191,155							
Grant Specialist	2,080	\$36.76	\$76,462	\$76,462							
Grant Specialist	2,080	\$36.76	\$76,462	\$76,462							
Grant Accountant	1,040	\$41.60	\$43,266	\$43,266							
Grant Accountant Supervisor	520	\$44.60	\$23,190	\$23,190							
Total Direct Labor Cost			\$740,809	\$740,809							
<b>2. Fringe Benefits</b>											
	Rate (%)	Base	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Division Administrator	39.13%	\$33,576	\$13,138	\$13,138							
Deputy Administrator	39.13%	\$32,025	\$12,531	\$12,531							
Policy Initiatives Adv	39.13%	\$28,138	\$11,010	\$11,010							
Fiscal Section Chief	39.13%	\$24,819	\$9,712	\$9,712							
Budget & Policy Analyst	39.13%	\$44,537	\$17,427	\$17,427							
Financial Specialist	39.13%	\$34,266	\$13,408	\$13,408							
Bureau Director	39.13%	\$58,572	\$22,919	\$22,919							
Section Chief	39.13%	\$74,342	\$29,090	\$29,090							
Grant Specialist	39.13%	\$191,155	\$74,799	\$74,799							
Grant Specialist	39.13%	\$76,462	\$29,920	\$29,920							
Grant Specialist	39.13%	\$76,462	\$29,920	\$29,920							
Grant Accountant	39.13%	\$43,266	\$16,930	\$16,930							
Grant Accountant Supervisor	39.13%	\$23,190	\$9,074	\$9,074							
Total Fringe Benefits Cost			\$289,879	\$289,879							

**Grant Application Detailed Budget Worksheet**

OMB Number 2501-0044  
Expiration: 2/28/2027

Applicant Name: Wisconsin Department of Administration - DEHCR											
<b>3. Travel</b>											
<b>3a. Transportation - Local Private Vehicle</b>	<b>Mileage</b>	<b>Rate per Mile</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Onsite transportation and Monitoring car/mileage	7000	\$0.510	\$3,570	\$3,570							
Subtotal - Trans - Local Private Vehicle			\$3,570	\$3,570							
<b>3b. Transportation - Airfare (show destination)</b>	<b>Trips</b>	<b>Fare</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Subtotal - Transportation - Airfare			\$0	\$0							
<b>3c. Transportation - Other</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Subtotal - Transportation - Other			\$0	\$0							
<b>3d. Per Diem or Subsistence (indicate location)</b>	<b>Days</b>	<b>Rate per Day</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
On Site Inspection and Monitoring - hotel	10	\$98.00	\$980	\$980							
On Site Inspection & Monitoring -meals(Lunch)	30	\$12.00	\$360	\$360							
On Site Inspection & Monitoring-meals (Dinner)	10	\$23.00	\$230	\$230							
Onsite inspection & Monitoring-meals(breakfast)	10	\$10.00	\$100	\$100							
Subtotal - Per Diem or Subsistence			\$1,670	\$1,670							
<b>Total Travel Cost</b>			\$5,240	\$5,240							
<b>4. Equipment (Only items over \$5,000 Depreciated value)</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
<b>Total Equipment Cost</b>											



# Grant Application Detailed Budget Worksheet

OMB Number 2501-0044  
Expiration: 2/28/2027

**Applicant Name:** Wisconsin Department of Administration - DEHCR

5. Supplies and Materials (Items under \$5,000 Depreciated Value)											
5a. Consumable Supplies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Consumable Supplies											
5b. Non-Consumable Materials	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Non-Consumable Materials											
<b>Total Supplies and Materials Cost</b>											
6. Consultants (Type)	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>Total Consultants Cost</b>											
7. Contracts and Sub-Grantees (List individually)											
7a. Contracts	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Competitive	TBD	TBD	\$24,482,000	\$28,482,000							
Subtotal - Contracts			\$24,482,000	\$28,482,000							
7b. Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Brown County			\$604,000	\$604,000							
Chippewa County			\$604,000	\$604,000							
Columbia County			\$604,000	\$604,000							
La Crosse County			\$604,000	\$604,000							
Langlade County			\$604,000	\$604,000							
Douglas County			\$604,000	\$604,000							
Juneau County			\$604,000	\$604,000							
Subtotal - Sub-Grantees			\$4,228,000	\$4,228,000							
<b>Total Contracts and Sub-Grantees Cost</b>											

# Grant Application Detailed Budget Worksheet

OMB Number 2501-0044  
Expiration: 2/28/2027

**Applicant Name:** Wisconsin Department of Administration - DEHCR

8. Construction Costs				HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>8a. Administrative and legal expenses</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Included in 7a and 7b above											
Subtotal - Administrative and legal expenses											
<b>8b. Land, structures, rights-of way, appraisal, etc</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Included in 7a and 7b above											
Subtotal - Land, structures, rights-of way, ...											
<b>8c. Relocation expenses and payments</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Included in 7a and 7b above											
Subtotal - Relocation expenses and payments											
<b>8d. Architectural and engineering fees</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Included in 7a and 7b above											
Subtotal - Architectural and engineering fees											
<b>8e. Other architectural and engineering fees</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Included in 7a and 7b above											
Subtotal - Other architectural and engineering fees											
<b>8f. Project inspection fees</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Included in 7a and 7b above											
Subtotal - Project inspection fees											

# Grant Application Detailed Budget Worksheet

OMB Number 2501-0044  
Expiration: 2/28/2027

Applicant Name: Wisconsin Department of Administration - DEHCR											
	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>8g. Site work</b>											
Included in 7a and 7b above											
Subtotal - Site work											
<b>8h. Demolition and removal</b>											
Included in 7a and 7b above											
Subtotal - Demolition and removal											
<b>8i. Construction</b>											
Included in 7a and 7b above											
Subtotal - Construction											
<b>8j. Equipment</b>											
Included in 7a and 7b above											
Subtotal - Equipment											
<b>8k. Contingencies</b>											
Included in 7a and 7b above											
Subtotal - Contingencies											
<b>8l. Miscellaneous</b>											
Included in 7a and 7b above											
Subtotal - Miscellaneous											
<b>Total Construction Costs</b>											

**Grant Application Detailed Budget Worksheet**

OMB Number 2501-0044  
Expiration: 2/28/2027

Applicant Name: Wisconsin Department of Administration - DEHCR											
9. Other Direct Costs	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Item											
Other Telecommunications (Cell)	60	42	\$2,500	\$2,500							
Space Rent	60	167	\$10,000	\$10,000							
ID Telecom	60	300	\$18,000	\$18,000							
Other Admin	60	3537	\$212,234	\$212,225							
<b>Total Other Direct Costs</b>			\$242,734	\$242,725							
<b>Subtotal of Direct Costs</b>			\$242,734	\$242,725							
10. Indirect Costs	Rate	Base	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Type											
	1.10%	\$1,030,688	\$11,338	\$11,338							
<b>Total Indirect Costs</b>			\$11,338	\$11,338							
<b>Total Estimated Costs</b>			\$30,000,000								