

# Employment Grants Program

*Connecting people  
experiencing homelessness  
with permanent  
employment and training  
opportunities.*

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## Program Manual

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## Grant Year 2024

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State of Wisconsin

Department of Administration

Division of Energy, Housing,  
and Community Resources

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Provides program rules and  
guidance for the Employment  
Grants Program

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Last Revised August 2023

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# Chapter 1: General Information

## 1. Introduction

The Wisconsin Department of Administration's (DOA) Division of Energy, Housing, and Community Resources (DEHCR) developed this handbook as a resource for the Employment Grants (EG) program. EG grantees are required to follow all state and program requirements, policies, and procedures in this guide.

## 2. Program Overview

The Employment Grants program was created by [statute 16.313](#), which was passed as part of the 2017-2019 Wisconsin State Budget (2017 Wisconsin Act 19). The EG program uses General Purpose Funds (taxpayer revenue raised by the State) with the goal of connecting people experiencing homelessness with permanent employment and training opportunities. Recipients of this grant are limited to municipalities (defined as counties, cities, villages, or towns) and federally recognized tribal governing bodies.

Awards are annual grants of up to \$75,000. The grantee is expected to provide at least \$10,000 in cash match. Applicants are encouraged to apply for the full award amount. Funds can be used to pay for program, operational, and administrative costs.

DEHCR will likely award one (1) grant per year. The final grantee will be determined based on the applicant's merit (determined by their application score). Preference for funding will go towards grantees who will use the majority of the grant and cash match to pay for EG program participants' wages and who will partner with an agency to provide additional employment and supportive services to EG program participants.

## 3. Eligible Applicants

Eligible applicants are limited to municipalities (defined as counties, cities, villages, or towns) and federally recognized tribal governing bodies that meet the following requirements:

- 1) Applicant can provide the minimum cash match requirement of \$10,000.
- 2) Applicant has either an active Homeless Management Information System (HMIS) subscription or will partner with an organization with an active HMIS subscription, and that organization will fulfill the HMIS data entry requirements for the EG program.
- 3) Applicant is registered with SAM.gov and can show proof of non-debarment/not having any active exclusions.

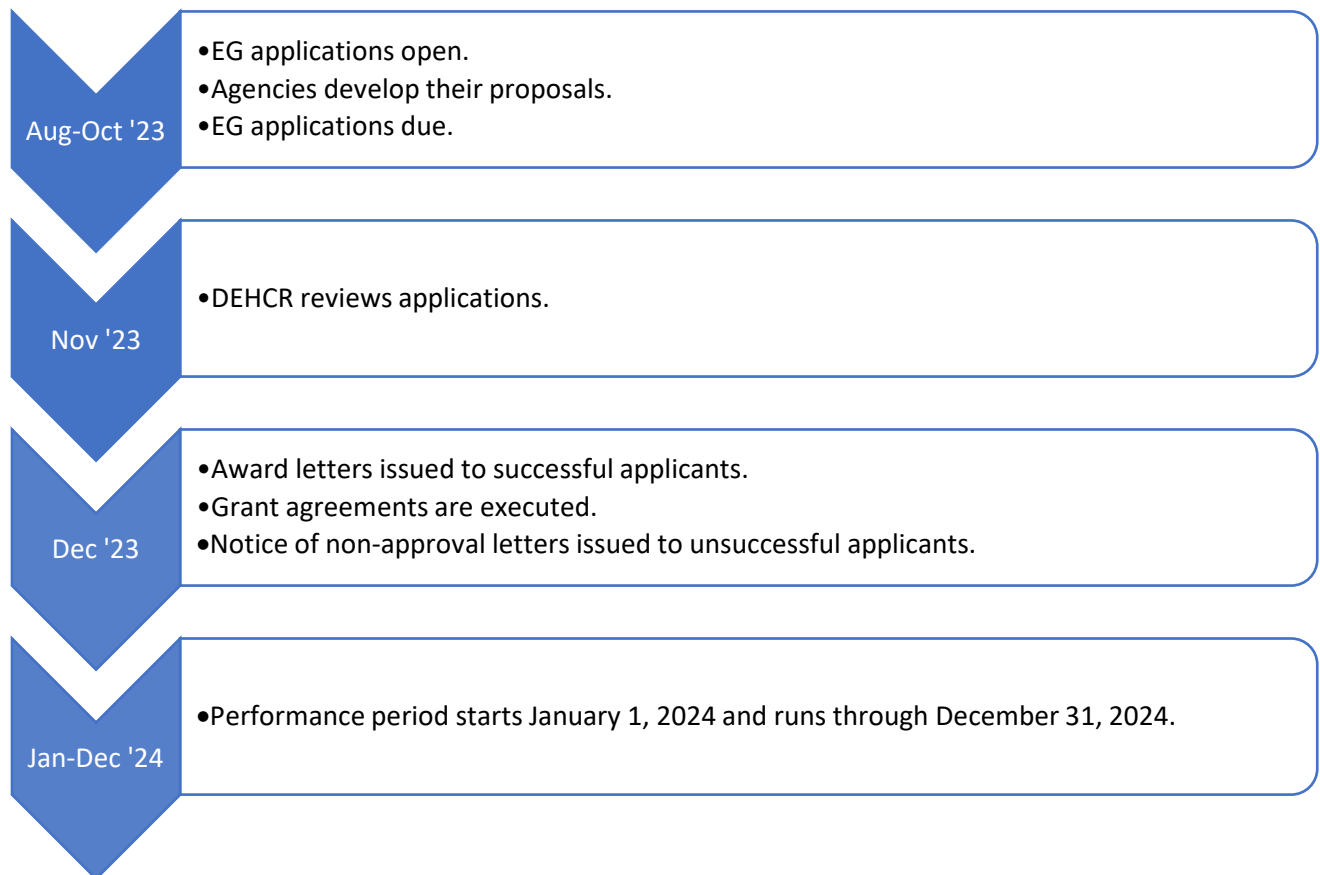
## Chapter 2: Application Process & Grant Timeline

### 1. Overview

DEHCR will post an application on their [website](#) inviting all interested applicants who meet the eligibility requirements to submit. Applicants will be given a set amount of time to develop their applications. After the submission deadline, a review team at DEHCR will score each application. The applications will be ranked, and the top scoring application based on the scoring criteria will receive an award. Preference will be given to applicants that plan to use the highest percentage of the grant and cash match toward paying EG program participants' wages, and who will partner with an agency to provide additional employment and supportive services to EG program participants. DEHCR reserves the right to alter this process and adjust scoring criteria.

### 2. General Timeline

The general timeline for the annual EG award process is as follows:



Please note DEHCR reserves the right to change timing with or without notice.

### 3. Rights of the Applicant

Each applicant whose proposal is reviewed by the grant review committee shall receive written notice of the determination of approval or non-approval of funding for their proposed EG program. The grant agreement will be executed upon signature of both parties.

## Chapter 3: Program Requirements

### 1. Client Eligibility

Individuals that are 18 years old or older and meet the definition of homeless according to Federal statute 24 CFR 576.2 (HUD Homeless Categories 1, 2, 3, 4) are eligible to be EG program participants.

The individual's eligibility must be confirmed immediately prior to entry into the EG program, and the individual must qualify as homeless (HUD Homeless Categories 1, 2, 3, 4) when they enter the EG program.

Below are the criteria for defining each eligible category of homelessness, and the associated documentation requirements.

Category	Criteria	Documentation Requirements
Category 1: Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li> <li>• For Individuals exiting an institution – one of the forms of evidence above <u>and</u>:                             <ul style="list-style-type: none"> <li>○ Discharge paperwork <u>or</u> written/oral referral, <u>or</u></li> <li>○ Written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited an institution</li> </ul> </li> </ul>
Category 2: Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>• For individuals and families leaving a hotel or motel – evidence that they lack the financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <u>and</u></li> <li>• Certification that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing</li> </ul>

<p>Category 3: Homeless under other Federal statutes</p>	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>	<ul style="list-style-type: none"> <li>• Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u></li> <li>• Certification of no permanent housing (PH) in last 60 days; <u>and</u></li> <li>• Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u></li> <li>• Documentation of special needs or 2 <u>or</u> more barriers</li> </ul>
<p>Category 4: Fleeing/Attempting to Flee Domestic Violence</p>	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence;</li> <li>(ii) Has no other residence; <u>and</u></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>	<p>For non-victim service providers:</p> <ul style="list-style-type: none"> <li>• Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by self-certification or by the caseworker. Where the safety of the individual is not jeopardized, the oral statement must be verified; <u>and</u></li> <li>• Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> <p>For victim service providers:</p> <ul style="list-style-type: none"> <li>• An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.</li> </ul>

Source and link to downloadable PDF: [At a Glance Criteria and Recordkeeping Requirements for Definition of Homeless \(hudexchange.info\)](#).

## 2. Client Applications & Pre-Screening

Client applications must be submitted in writing (either in-person or electronically) and must include all information required by the grantee to determine the client's eligibility. Grantees may develop application forms that meet their specific needs.

Grantees may choose to use a shorter pre-screen form to place potentially eligible applicants on a waiting list. If an applicant is selected from the waiting list, they must then complete the full application form, which must include new/updated information to be used to determine final eligibility at the client's point of entry into the EG program.

## 3. Waiting List Policy

The demand for assistance may be greater than available resources. Grantees may choose to use a waiting list. If a waiting list is used, the grantee must establish a written Waiting List Policy which defines how the waiting list is managed. The following is a non-exhaustive list of parameters grantees may use to organize their waiting lists:

- 1) The order in which assistance is offered (i.e. preference selection policy based on aggregate needs, first come first served, lottery, etc.);
- 2) The length of time for utilizing the waiting list (i.e. maintaining the list for a fixed period of time, then starting over; accepting applications for a fixed period of time, then closing until all eligible applicants receive assistance; continuously accepting applications; etc.).

## 4. Client Denial

Clients who fill out the application for the EG program and then are determined to be ineligible based on the information provided in the application must be notified in writing. The written notice must identify why the applicant is ineligible. It must also inform the client that they have ten (10) calendar days from the date of notice to request a review of the decision. Reviews can be requested verbally or in writing (physical or electronic) to the grantee.

If the client is put on the waiting list after filling out the application for the EG program, this does not trigger the need to issue a formal denial letter.

## 5. Overview of Eligible Activities & Reimbursable Costs

Each award is divided into three (3) categories: program, operational, and administrative funds.

### 1) Program Funds

Per the WI statute creating the EG program, grantees are encouraged to spend the majority of the overall award on paying EG program participants' wages. Wages can be paid to EG participants for time spent participating in job/work experience, skills training, company tours, budgeting classes, time spent doing educational assessments, goal setting, job searches/applications, resume building, cover letter writing, performing mock interviews, going on college/technical school tours, and registering for classes.



## 2) Operational Funds

These funds can pay for the cost of providing the above programming, including but not limited to, skills training, educational assessments, and case management focused on connecting EG participants to permanent employment and training opportunities (examples may include liaising with employers and EG participants to help smooth EG participants' onboarding processes, working with EG participants on setting goals/ resume building etc.).

In order to have case management time be eligible to be billed to operational funds, the case manager's timesheets must clearly reflect time spent working with EG program participants and their associated employers to connect them with permanent employment and training opportunities. Time spent working on other activities (examples include, but are not limited to, working with clients supported by another grant and working reception) must also be clearly reflected on the case manager's timesheets.

Costs directly tied to a case manager such as office space, computer costs, and mileage can also be charged to operational funds. In order to charge these costs, grantees must have an allocation plan showing how only the portion of the resource that was dedicated to the EG program is being charged to the grant. Please note, capital expenditures are not allowable costs. Grantees should work with their accounting department to determine what can be charged following standard accounting practices.

## 3) Administrative Funds

These funds can pay for shared administrative costs such as, but not limited to, the cost of office space, computers, office supplies, and salaries for agency wide functions such as accounting. Shared administrative functions require an allocation plan detailing how only the portion of the staff person's time or the resource dedicated to the EG program was billed to the grant. Any indirect costs billed to the grant should follow standard accounting practices.

Capital expenditures cannot be charged to the grant. Grantees should work with their accounting department to determine what can be charged following standard accounting practices.

The grantee will be expected to provide a cash match of \$10,000. Cash match funds can be spent in any of the three (3) areas as outlined above, however per WI [statute 16.313](#) it is preferred match funds are spent on EG participants' wages. Match spending will be tracked on payment requests. See [Chapter 6: Payment Schedule, Process & Policy](#) for more information.

## 6. Non-Reimbursable Costs

EG funds may not be spent on the following:

- 1) Expenses incurred outside of the performance period.
- 2) Capital expenditures.
- 3) Alcoholic beverages.
- 4) Items that could be construed as entertainment, including social activities and tickets to movies, shows, sports events, or concerts, and any costs related to attending such events, whether or not admission is charged.

If it is found the grantee used grant funds for any of the above outlined non-reimbursable items/activities, the grantee will be required to refund the dollars used for the non-reimbursable items/activities.

## Chapter 4: Administrative Requirements

### 1. Contractual Responsibility

Grantees must commit to providing the services mutually agreed upon in the contracts. Grantees may choose to provide all services directly or may subcontract to another public, private, or non-profit organization.

The grantee must maintain primary responsibility for all contractual issues, however administrative duties and program delivery may be subcontracted out.

If the grantee decides to subcontract, they must encumber all subrecipients with the program delivery requirements outlined in the grantee's contract and application. The grantee must also monitor their subrecipient at least once during the contract to check for compliance. This monitoring must include a review of client files, procedures, policies and financials as outlined in [Chapter 8: Annual Monitoring](#) in this document. The grantee must also develop a payment process for disbursing EG payments in a timely manner (within thirty (30) days of receiving the payment from DEHCR) to the sub-recipient.

Grantees must participate in any EG trainings, events, and workshops.

### 2. Contract Amendments & Budget Reallocations

Grantees may amend their contracts only with written approval from DEHCR. Contract amendments can extend the performance period. To request a contract amendment, EG grantees must consult with the Grant Specialist, then electronically submit a written request.

Reallocating funds between fund types (program, operational, administrative) does not require a contract amendment but does require the grantee to request a reallocation and DEHCR to approve the reallocation.

Requests for a contract amendment or a budget reallocation must include:

- 1) A written request defining and justifying the contract amendment and/ or budget reallocation. The request must be signed by someone with contract signature authority (digital signatures are accepted);
- 2) Include an excel chart showing the current budget allocation, the amount spent to date, and the requested change (if applicable).

The request must be emailed to the Grant Specialist (contact information is available on [DEHCR's website](#)).

**DEHCR must receive all contract amendment requests and budget reallocation requests no later than thirty (30) days before the end of the contract period.**

### 3. Homeless Management Information Systems (HMIS) Requirements

The HMIS database is used to measure the scope of homelessness in Wisconsin, track service delivery and help evaluate the effectiveness of service interventions.

As a condition of funding, grantees are required to collect information from EG participants and enter it into the HMIS database. Please see [Chapter 7: Reporting](#) for more information. The grantee can either do this directly, if they have an active HMIS subscription, or can work with a partner organization with an active HMIS subscription, and have them do the required data entry.

Grantees must enter EG participants into an EG program within HMIS and keep HMIS up to date. Data on each client needs to be entered into HMIS no later than the fifth (5<sup>th</sup>) of the month for the previous month. Grantees must also commit to participating in applicable trainings throughout the contract period. DEHCR will monitor compliance and reserves the right to withhold payment if it is deemed client data is missing from HMIS.

### 4. Required Client File Elements

The following is a list of the critical elements that must be kept in each client file:

- 1) Intake form, initial assessment and/or application outlining the client's needs.
- 2) Documentation of eligibility (please see [Client Eligibility](#) for a list of documentation requirements).
- 3) Documentation of all EG services/referrals provided:
  - a. Skills training.
  - b. Company tours.
  - c. Budgeting classes.
  - d. Educational assessments/goal setting.
  - e. Job Center of Wisconsin.
  - f. Resume/cover letter/interview preparation.
  - g. College/technical college.
  - h. Job/work experience.
- 4) Documentation of the amount and type of financial assistance provided to client.
- 5) Client signed receipt of receiving the grantee's EG termination policy. If applicable, correspondence between the grantee and the client if the client was terminated.
- 6) Certification of entry and exit (if applicable) dates from the EG program in HMIS. Please use screenshots from HMIS.

Please see [Chapter 7: Reporting](#) for a list of other datapoints that need to be kept in HMIS for each client.

Please remove copies of social security cards, drivers' licenses, and birth certificates when sharing client files with DEHCR. Copies of these documents should never be kept in client files. All client files must be shared with DEHCR through secure means.

## 5. Practices, Policies, Procedures & Documentation

The following practices, policies, procedures, and documentation of such are required of each grantee and may be reviewed during the application process and during monitoring. In this section we provide a description of the required elements of each.

### 1) Accessibility Practices/Resources

Each grantee should have resources and practices in place to communicate with all potential beneficiaries including those with limited or no English. Further, facilities and programming should be accessible to people with disabilities including, but not limited to, people with vision loss, hearing loss, physical/mobility concerns, and learning disabilities.

### 2) Amendment & Budget Reallocation

DEHCR will not entertain a request for an amendment or a budget reallocation within 30 days of the end of the performance period.

### 3) Anti-Lobbying Requirements

Each grantee is required to have a policy in place to ensure compliance with anti-lobbying requirements. EG funds may not be used to influence federal or state contracting, or federal or state financial transactions, or federal or state cooperative agreements.

### 4) Client Data Entry

All EG program participants must be entered into an EG program in HMIS, and their data must be kept up to date.

### 5) Client Termination Policy (Specific to the EG program)

To terminate assistance to a client, the grantee must establish and follow a formal EG program specific termination process with the following requirements:

- Grantees must document the provision of the EG program termination policy to the client (the client must sign a document stating the policy was provided).
- Grantees may terminate assistance if a client violates the rules of the EG program.
- Grantees must establish and follow a formal process that recognizes individual rights.
- Grantees must allow termination in only the most severe cases.
- Grantees must establish a formal process that includes a written notice to the client containing a clear statement of the reasons for termination, opportunity to have the decision reviewed, in which the client is given the opportunity to present objections before a person other than the person who made or approved the termination decision and a prompt written notice of the final decision to the client.
- Grantees may provide assistance to a client who has been terminated from the EG program at a later date.

## 6) Client Waiting List Policy

If a waiting list is used, the grantee must establish a written Waiting List Policy which defines how the waiting list is managed.

## 7) Confidential, Proprietary, and Personally Identifiable Information Policy

All grantees must develop and implement written procedures to ensure:

- All records containing personally identifying information of any person or family who applies for and/or receives assistance will be kept secure and confidential.
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted will not be made public except with written authorization of the person responsible for the operation of the shelter.
- Grantees must develop and implement procedures to ensure the confidentiality of records pertaining to any person provided family violence prevention or treatment services under any project assisted, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.
- The use or disclosure by any party of any information concerning eligible individuals who receive services for any purpose not connected with the administration of the program is prohibited except with the informed, written consent of the eligible individual or the individual's legal guardian.

## 8) Conflict of Interest Policy

Grantees must have and comply with organizational, individual, and procurement conflict of interest policies.

### *Organizational Conflict of Interest*

Grantees must not condition EG assistance on a client's acceptance of housing or another good or service owned by the grantee, a parent or subsidiary of the grantee.

### *Individual Conflict of Interest*

The individual conflict of interest regulations prohibits financial gain for self, family, or those with business ties. No person who exercises responsibility over EG funded projects or who is in a position to participate in a decision-making process or gain inside information with regard to EG funded projects may:

- Obtain a financial interest or benefit from an assisted activity.
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity.
- Benefit from an assisted activity, either for themselves or for those with whom they have family or business ties, during their tenure or during the one-year period following their tenure.

### *Procurement Conflict of Interest*

In the procurement of property and services, the conflict-of-interest provisions of 42 CFR §495.348 apply. These regulations require grantees to maintain written standards governing the

performance of their employees engaged in awarding and administering contracts. At a minimum, these standards must:

- Require that no employee, officer, agent of the grantee shall participate in the selection, award, or administration of a contract supported by EG funds if their participation would create a real or apparent conflict of interest.
- Require that grantee employees, officers and agents not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.
- Stipulate provisions for penalties, sanctions, or other disciplinary actions for violations of standards.

Any grantee who violates the above will be required to repay any EG funds disbursed for which there is an identified conflict of interest unless an exception is granted by DEHCR.

#### 9) Contractual Responsibility

The grantee may choose to provide all services directly or may subcontract to another public, private, or non-profit organization. The grantee must maintain primary responsibility for all contractual issues, however administrative duties and program delivery may be subcontracted out. The grantee must also participate in any EG trainings, events and workshops.

If the grantee decides to subcontract, they must encumber all subrecipients with the program delivery requirements outlined in the program manual, the contract and the grantee's application. The applicant must monitor their subrecipient at least once during the performance period to check for compliance including reviewing client files, procedures, policies, and financials. The grantee must also develop a payment process for disbursing EG payments in a timely manner (within thirty (30) days of receiving payment from DEHCR) to the subrecipient.

#### 10) Drug Free Workplace Policy

Each grantee is required to have a Drug Free Workplace Policy and procedures to carry out the policy. The policy must include that the contracting or granting agency (DEHCR) will be notified within ten (10) days after the grantee receives notice that a covered employee (an employee supported with EG funds) has been convicted of a criminal drug violation in the workplace.

#### 11) Equal Access

Grantees must have policies and practices to ensure clients have equal access to services regardless of sexual orientation, gender identity, family composition or marital status.

#### 12) Equity Advancement & Culturally Responsive Practices

Each grantee is expected to identify the percentage of its service territory's homeless population that is BIPOC (Black, Indigenous, People of Color) compared to the White, and then identify the percentage of its client population that is BIPOC compared to White. If there is an imbalance in the BIPOC/White percentage split between the client population compared to the service territory's homeless population, outreach strategies to the underrepresented client population group must be developed and implemented.

### 13) Financial Management

All funding sources from DEHCR are to be tracked separately. Payroll expenses should include documentation from timesheet to paycheck. Timesheets should show hours spent on EG eligible activities vs. other non-EG activities. Shared administrative functions require an allocation plan detailing how only the portion of the staff person's time or the resource dedicated to the EG program was billed to the grant. Any indirect costs billed to the grant should follow standard accounting practices. Capital expenditures cannot be billed to the grant. The grantee should establish policies and procedures for keeping backup documentation on expenditures so it can be produced upon request.

### 14) Financial Statements

The grantee is required to provide access to financial statements and expenditure records upon request by representatives of the Department of Administration (DOA, DEHCR), and the Legislative Audit Bureau (LAB).

### 15) Identification

The grantee cannot require third party documentation such as birth certificates or photo identification as a condition of immediately admitting an individual or family into emergency shelter or providing them with services.

### 16) Monitoring

The grantee shall comply with monitoring visits and/or desk monitoring from the Department of Administration (DOA, DEHCR), and the Legislative Audit Bureau (LAB) for program compliance.

### 17) Non-Discrimination Policy for Clients & Employees

Each grantee must have a policy expressing discrimination against clients/potential clients and employees/potential employees based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, physical condition, disability, age (40 or older) or genetic information (including family medical history) is illegal and will not be tolerated. The policy should outline a way for clients and employees to report discrimination, and potential repercussions for those who engaged in discrimination.

### 18) No Required Faith Based Activities or Religious Influence

All EG funded activities must be administered in a manner that is free from religious influences and in accordance with the following principles.

- Grantees must not discriminate against any employee or applicant for employment and must not limit employment or give preference in employment to persons based on religion.
- Grantees must not discriminate against any person applying for shelter or services and must not limit shelter or services or give preference to persons based on religion.
- Grantees must provide no religious instruction or counseling, conduct no religious worship or services, engage in no religious proselytizing and exert no other religious influence in the provision of programs or services funded under the program.
  - If a grantee conducts these activities, the activities must be offered separately in time or location from the programs or services funded under the program, and participation must be voluntary for program participants.

### 19) Process to Ensure Client Eligibility

All grantees must have a process in place to screen clients to ensure eligibility. Eligibility must be checked immediately prior to entry into the EG program, and clients must be eligible for the EG program at entry.

### 20) Recordkeeping and Retention

Grantees must retain all program files and records (including client files) for a minimum of five (5) years after the contract period ends. All files must be available for review or audit upon request from the Department of Administration (DOA, DEHCR), and the Legislative Audit Bureau (LAB). Often the turnaround for file requests is short; therefore, files must be readily accessible so they can be provided within the timeframe requested.

### 21) Residency

The grantee shall not require homeless individuals or families to be residents of the state or locality to receive shelter and support services, nor shall the grantee set differing allowed lengths of stay or levels of service based on whether a homeless individual or family are residents of the state or locality.

### 22) Signing Authority Documentation

Each grantee must have documentation naming the person or persons who have signing authority for their organization.

### 23) Trauma-Informed Care Practices

Recognizing that many clients have experienced different types of trauma, each grantee is required to have trauma-informed care practices in place. Trauma-informed care practices are defined as an approach to intervention and providing services that focuses on how trauma may affect an individual's life and their response to receiving services in various systems. All grantees are expected to provide training to their staff on trauma-informed care practices.

## Chapter 5: Financial Management

### 1. Tracking of Funds

All funding sources from DEHCR are to be tracked separately. All expenditures must have backup documentation that can be produced upon request. Payroll expenses must have backup documentation from timesheet to paycheck and show allocation of hours by funding source. Shared administrative functions require an allocation plan detailing how only the portion of the staff person's time or the resource dedicated to the EG program was billed to the grant. Grantees are required to provide access to financial statements, charts of accounts, and expenditure records upon request by representatives of the Department of Administration (DOA, DEHCR), or the Legislative Audit Bureau (LAB).

### 2. Indirect Cost Allocation

Indirect costs billed to the EG program should follow standard accounting practices. Backup documentation supporting these costs should be able to be produced upon request.



### 3. Audit

The grantee shall have a certified annual audit performed utilizing generally accepted accounting principles and generally accepted auditing standards.

If an audit is required by federal law, the state funded programs shall also be included in the scope of the federally required audit.

Governmental and non-profit grantees, or their assignees, which received state funds during their fiscal year, shall comply with the requirements set forth in the State Single Audit Guidelines issued by the Department of Administration (DOA). Audit reports are due to the DOA within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period.

For information on submission of the audit reporting package please see the [Department of Administration's Single Audit Compliance Supplement](#).

## Chapter 6: Payment Schedule, Process & Policy

### 1. Quarterly Funds Disbursement & Updates

Grantees may draw on EG funds as reimbursement of expenditures. Grantees must submit a payment request every quarter. To initiate each payment, grantees must complete and submit a quarterly EG payment request form on or before the fifteenth (15th) of the month following the close of the prior quarter. Cash match spending will also be reported and tracked on the EG payment request form. Please note, client data in HMIS must be kept up to date and DEHCR reserves the right to withhold payment if it is deemed client data is missing from HMIS or reporting requirements have not been met. Please see [Chapter 7: Reporting](#) for more information.

Grantees are also required to provide a short quarterly update on their EG program, including projections for the number of clients who will be served, and the expected expenditure of funds through the end of the performance period. Grantees will be expected to provide a quarterly update throughout the entire performance period.

Payment requests must be submitted by email to [DOADEHCRFiscal@wisconsin.gov](mailto:DOADEHCRFiscal@wisconsin.gov) copying the Grant Specialist (contact information available on [DEHCR's website](#)). To aid the DEHCR Fiscal team, please use the following email subject line:

***EG 23-01, Grantee Name, Quarter or Month/2023***

Spending updates should be sent directly to the Grant Specialist. DEHCR reserves the right to change all policies and timing described.

### 2. Final Payment Request & Close Out

Grantees must submit their final payment request, financial close out report, final quarterly reporting and annual reporting, and update/complete all client files within HMIS within 60 days of the

performance period end date or termination of the contract whichever comes earlier. If the payment request is not submitted, or all client files and reporting are not updated/completed within the specified timeframe, DEHCR reserves the right to decline the final reimbursement request. DEHCR reserves the right to change all policies and timing described.

## Chapter 7: Reporting

Grantees are required to submit quarterly reporting to DEHCR which must be received on or before the fifteenth (15th) of each month following the close of the previous quarter. Annual reporting is due 60 days after the close of the performance period, or termination of the contract whichever comes earlier. DEHCR can provide a reporting template for the grantee to use, or the grantee can use a combination of an HMIS report (doing this will require a custom EG reporting module and report be created<sup>1</sup>) and a financial report to share the data instead.

### 1. Quarterly Reporting

Grantees must submit quarterly reports with the data points listed below. Element one could be pulled from a financial ledger, and elements two through four could be pulled in HMIS (through a custom EG reporting module and report). The required data elements are:

- 1) The amount provided in wages for individuals participating in the program.  
*\*\* Note, grantees must report all wage expenditures under the program including but not limited to EG funds and any cash matching funds.*
- 2) The numbers of individuals served.
- 3) The number of persons provided services/referrals:
  - a. Skills training.
  - b. Company tours.
  - c. Budgeting classes.
  - d. Educational assessments/goal setting.
  - e. Job Center of Wisconsin.
  - f. Resume/cover letter/interview preparation.
  - g. College/technical college.
  - h. Job/work experience.
- 4) The number of previously unemployed participants that gained employment through the Employment Grant.

DEHCR reserves the right to require additional information or reports as needed.

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<sup>1</sup> Please contact [Institute for Community Alliances](#) for more information.

## 2. Annual Reporting

Grantees must submit an Annual Report covering the entire contract period within 60 days of the performance period end date or termination of the contract whichever comes earlier. The report must include all the [Quarterly Reporting](#) datapoints aggregated and unduplicated for the year, plus the following datapoints:

1. The number of individuals with earned income:
  - a. At the start of the EG program (at entry into the program).
  - b. Upon exit from the EG program.
  
2. The number of individuals with any income:
  - a. At the start of the EG program (at entry into the program).
  - b. Upon exit from the EG program.
  
3. The number of individuals with no income:
  - a. At the start of the EG program (at entry into the program).
  - b. Upon exit from the EG program.
  
4. The total number of individuals:
  - a. At the start of the EG program (at entry into the program).
  - b. Upon exit from the EG program.
  
5. The number of individuals in each monthly cash income range (monthly ranges are: no income, \$1-\$150, \$151-\$250, \$251-\$500, \$501-\$1,000, \$1,001-\$1,500, \$1,501-\$2,000, \$2001+, client doesn't know/refused, data not collected)
  - a. At the start of the EG program (at entry into the program).
  - b. Upon exit from the EG program.

All of the above datapoints can be pulled in HMIS.

Grantees are also required to write a short performance summary evaluating areas of success, areas of challenge, what they learned and what solutions they would implement if they were continuing the EG program. DEHCR is interested in hearing about the grantee's specific implementation of the EG program, and if they have feedback on the overall EG program.

## Chapter 8: Monitoring

DEHCR will monitor performance and requirements compliance at least annually. During the monitoring grantees should expect DEHCR to ask to see all of the documentation and proof of policies and procedures as outlined in [Chapter 3: Program Requirements](#), [Chapter 4: Administrative Requirements](#), [Chapter 5: Financial Management](#) and [Chapter 7: Reporting](#). The monitoring can be either onsite or a desk monitoring. DEHCR reserves the right to change the monitoring requirements.

## Chapter 9: Resources

### 1. Questions?

Any questions regarding the application process or this grant can be directed to the Grant Specialist (contact information available on [DEHCR's website](#)) or [DOASupportiveHousing@wisconsin.gov](mailto:DOASupportiveHousing@wisconsin.gov).

### 2. Links

Information on the following topics can be found at the associated websites provided below:

- Employment Grants Program Website: [DEHCR Website: Employment Grants](#)
- [WI Statute 16.313](#) creating the Employment Grants
- HUD definitions for category 1, 2, 3 and 4 homelessness and their associated documentation requirements for confirming eligibility: [At a Glance Criteria and Recordkeeping Requirements for Definition of Homeless \(hudexchange.info\)](#)
  - Categories 1-4 are eligible under the EG program.
- Information on Continua of Care (CoCs) and how to find the CoC for your organization's area can be found on [DEHCR's Website: Supportive Housing Resources and Training](#).