

**State of Wisconsin Department of Administration
Division of Energy, Housing and Community Resources
HOME-American Rescue Plan Frequently Asked Questions**

HOME-ARP Supportive Services FAQs

Topic	Question	Response
Applications and related documentation	Our organization leads the local homeless coalition. Should we ask another member/officer of the coalition for the required letter of support or should we ask the state?	We have instructed applicants to reach out to the Balance of State for a letter of support in these cases.
	Does the applicant of a HOME-ARP Supportive Services grant need to be a subscriber of the Homeless Management Information Systems (or a comparable database)?	<p>Yes, the lead organization or entity applying for HOME-ARP Supportive Services funding must be subscribed to HMIS at the time of application.</p> <p>A list of participants served in the HOME-ARP Supportive Services program must be able to be produced upon request. At minimum this participant list needs to show unique participant identifiers such as entry and exit dates into the program. This report must be able to be pulled from HMIS or a comparable database. Grantees must maintain an accurate record of participants served and must comply with all HMIS participation requirements including attending applicable training throughout the performance period of the grant agreement.</p>

Eligible Services	Can HOME-ARP Supportive Services (i.e. case management, life skills training, mental health outpatient services. etc.) be requested for participants currently receiving TBRA from another source?	<p>Participants may receive HOME-ARP Supportive Services if they meet the definition of one of the four qualifying populations. All the State’s HOME-ARP Supportive Services participants are subject to screening through Expanded Coordinated Entry, even if they are currently being served through an organization’s current TBRA/assistance program. In the case that no preference is identified for the supportive service project, then those who meet the definitions of one of the QPs would be accepted in chronological order pending the screening and application process set by the org and CoC. Therefore, to ensure current TBRA participants receive case management through HOME-ARP Supportive Services, you would have to ensure they are referred once the list opens. But the list cannot be limited to participants in the current TBRA program.</p> <p>This does not apply to Financial Assistance through HOME-ARP Supportive Services, in cases in which the Financial Assistance would result in a duplication of TBRA.</p>
Eligible Services	Is purchase the purchase of a vehicle allowable under the “Transportation” service?	No, purchasing a vehicle is not an eligible purchase for the “transportation” service.
Eligible Services	Can HOME-ARP Financial Assistance for Rent be used by participants living in units owned by the subrecipient?	No, this would classify as a conflict of interest. Financial Assistance for Rent may only be used in units outside of the subrecipients portfolio.
Eligible Services	The application states “Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources.” So for example, if a PSH client is receiving rent assistance through that program, we cannot use these supportive service dollars to help the same client with any other rent-related costs or rent arears?	This depends. If the PSH rental assistance does not already cover utility costs, nor was it used to pay for any of the costs listed under the financial assistance costs outlined in CPD Notice 21-10/the HOME-ARP Supportive Services program guide, then it may be applied to that participant. In that case, there must be

		clear documentation of what PSH covers vs. what the HOME-ARP funds would cover to ensure there is no duplication
Eligible Services	Can the subrecipient provide participants with supportive services through this funding that are NOT financial even if they are already receiving supportive services through other sources?	As long as the specific services (i.e. childcare, transportation, employment assistance etc.) are not duplicated and there is documentation that assures those services are not duplicated, then this would be permissible. Doubling-up of services is not allowed.
Program Participant Selection/Expanded Coordinated Entry	Does our project need to establish a preference?	No, projects are not required to establish a preference, but they will score more favorably if they target populations with a higher need for assistance (i.e. the homeless QP). If no preference is established, Qualifying Households must be accepted in chronological order of application, as determined by Balance of State Expanded CE staff.
Program Participant Selection/Expanded Coordinated Entry	Can we limit the services to any of the qualifying populations?	No, limitations to a specific Qualifying Population or subgroup is not allowable per the HUD-approved Allocation Plan for the State's HOME-ARP Program .
Misc.	Can I apply for Nonprofit Operating and Capacity Building Assistance?	Nonprofit Operating and Capacity Building Assistance is only available to successful non-profit applicants who will own and operate HOME-ARP Rental Development Units within 24 months of the award.

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HOME-ARP Affordable Rental Housing FAQs

Topic	Question	Response
Application	Is there an application training available?	Yes, it is available to download on DEHCR's HOME-ARP Webpage .
Application/Environmental Review	Must all environmental concerns be remediated at the time of application?	No. While a completed Environmental Review must be submitted on Access.gov at the time of application submission, all issues do not need to be resolved at that time. DEHCR will continue to assess the application and may provide a conditional approval, contingent upon the resolution of concerns identified in the review.
Project Operation	If a capitalized operating reserve is maintained for the project, can the project terminate tenancy due to a Qualifying Population (QP) tenant's inability to pay rent?	No, a tenant's tenancy may not be terminated due to inability to pay rent if the unit is supported by the capitalized operating reserve. This reserve is only available for HOME-ARP QP units.
Project Operation	Is a capitalized operating reserve required for HOME-ARP units?	No it is not required, if the project has already procured a Project-Based Rental Assistance subsidy from another source. In special cases, where no PBRA or Capitalized Operating Reserve is established, projects must demonstrate a reliable rental assistance pipeline is available for households in HOME-ARP QP units.

Project Operation	When may tenancy be terminated for HOME-ARP QP units?	<p>Tenancy may only be terminated for:</p> <ol style="list-style-type: none"> 1.Serious or repeated violation of the terms and conditions of the lease; 2.Violation of applicable Federal, State of Wisconsin (State), or local laws; 3.Other good cause. An increase in the tenant’s income does not constitute good cause.
General	Please explain how this is different than the normal HOME funds that are available? Can both HOME and HOME-ARP be used in a project?	<p>There are several substantial differences between HOME and HOME-ARP. HOME-ARP housing is targeted for qualifying populations, meaning those who are homeless, at risk of homelessness, fleeing domestic violence, or whose housing stability is substantially at risk.</p> <p>No less than 70% of HOME-ARP assisted units within a project must be reserved for these populations and the local Continuum of Care’s Coordinated Entry must be used to fill those units (these units cannot go above a LOW HOME rent/income limit).</p> <p>The remaining 30% or less of HOME-ARP units CAN be used for families who are low or moderate income based on typical HOME rules.</p> <p>There are a number of other significant differences, which are well summarized in</p>

		<p>CPD Notice 21-10 (The HOME-ARP Implementation Notice) and the Appendix on related waivers.</p> <p>Both HOME and HOME-ARP may be used in a project's funding.</p>
Misc.	Can I apply for Nonprofit Operating and Capacity Building Assistance?	Nonprofit Operating and Capacity Building Assistance is only available to successful non-profit applicants who will own and operate HOME-ARP Rental Development Units within 24 months of the award.
Project Operation	What are the unit mix requirements for a HOME-ARP Development Project?	<p>These are outlined in the threshold items indicated in the HOME-ARP Rental Development Program Guide and Application Instructions.</p> <ul style="list-style-type: none"> • 50% of all HOME-ARP assisted units must be designated as 30% County Median Income (CMI) units. These units can be a mix of Qualifying Population (QP) units and non-QP Low-Income units. • No less than 70% of HOME-ARP-assisted units in a project must be reserved for Qualifying Populations. QP units may not exceed the LOW HOME rent limit or Fair Market Rent, whichever is lower. This has the caveat that QP households can only be charged up to 30% of their income for rent regardless of what their income is. • No more than 30% of HOME-ARP assisted units in a project may be

		<p>for non-QP Low-Income households, and rent may not exceed the HIGH HOME rent limit or Fair Market Rent whichever is lower.</p> <ul style="list-style-type: none"> • 50% or more of all HOME-ARP assisted units must be visitable. A visitable unit is defined as having 32” clear openings in all interior and bathroom doorways, providing at least one accessible means of egress/ingress for each unit, and having one bathroom on the first floor of each unit.
Application	Do all funding sources need to be committed before applying for HOME-ARP Rental Development funds?	Yes, all funding sources should be committed prior to applying for HOME-ARP Rental Development Funding. In the case that funding is not yet committed, DEHCR will make a determination to conditionally approve proposals contingent upon the commitment of aforementioned funding.
Development	Are HOME-ARP units subject to Davis-Bacon Labor Standards?	Yes, HOME-ARP developments are subject to Davis-Bacon. 24 CFR Part 92.354 dictates that a contract for construction with twelve (12) or more HOME or HOME-ARP assisted units pay to all laborers and mechanics not less than the wages prevailing in that locality as predetermined by the U.S. Department of Labor. Prevailing wages must be paid on the entire development, not just the HOME-ARP assisted units and the wage provisions must be in the construction contract. Adherence to Davis-Bacon will be

		monitored and can drastically impact the development cost of any given project.
Tenant Selection/Expanded Coordinated Entry	Does our project need to establish a preference?	No, projects are not required to establish a preference, but they will score more favorably if they target populations with a higher need for assistance (i.e. the homeless QP). If no preference is established, Qualifying Households must be accepted in chronological order of application, as determined by Balance of State Expanded CE staff.
Tenant Selection/Expanded Coordinated Entry	Can we limit the services to any of the qualifying populations?	No, limitations to a specific Qualifying Population or subgroup is not allowable per the HUD-approved Allocation Plan for the State's HOME-ARP Program .