

**HOME-American Rescue Plan  
(HOME-ARP)  
Supportive Services Program  
Manual  
Grant Year 2024**

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State of Wisconsin  
Department of  
Administration

Division of Energy, Housing, and  
Community Resources

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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 Program Manual as a resource for the Supportive Services activity as a part of the larger HOME-American Rescue Plan Program (HOME-ARP). HOME-ARP Supportive Services grantees are required to follow all state and federal requirements, policies, and procedures in this Program Manual.

### 2. Background

The HOME program was created by the National Affordable Housing Act of 1990. The statutory purpose of the HOME program is "to increase the number of families served with decent, safe, sanitary, and affordable housing and expand the long-term supply of affordable housing". Regulations governing HOME are published in 24 CFR Part 92 (Final Rule, published July 24, 2013, as amended (effective August 23, 2013)).

On March 11, 2021, the American Rescue Plan Act of 2021 was signed into law and on September 13, 2021, the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development Division issued Notice CPD-21-10. Notice CPD-21-10 establishes the requirements for HOME-ARP funds appropriated under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2). In addition to Notice CPD-21-10, HUD has issued a memorandum describing waivers and alternative requirements for the HOME-ARP Program. A link to that memorandum can be found as follows:

<https://www.hudexchange.info/resource/6479/notice-cpd-2110-requirements-for-the-use-of-funds-in-the-home-arp-program/>

The information in this Program Manual and application guide for the HOME-ARP Supportive Services program is current as of November 2023.

HOME-ARP is a brand-new program and HUD implementation tools are under development. Additional HUD guidance is anticipated in the future. Interested applicants are encouraged to visit <https://www.hudexchange.info/programs/home-arp/> for additional updates and guidance. This Program Manual may be amended by DEHCR in the event HUD issues future guidance regarding this program.

### 3. Program Overview

HOME-ARP funds may be used to provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP funding programs.

Supportive services available for funding under the HOME-ARP Supportive Services activity include:

- a) Services listed in Section 401(29) of the McKinney-Vento Homeless Assistance Act (“McKinney-Vento Supportive Services”) and as defined under 42 U.S.C. § 11360(29).
- b) Homelessness prevention services as described in Sections VI.D.3 and D.4 of the [CPD Notice 21-10](#) and;
- c) Housing counseling services under HOME-ARP which are services that are consistent with the definition of “housing counseling” and “housing counseling services” defined at [24 CFR §§ 5.100](#) and [5.111](#).

HOME-ARP Supportive Services grants must be a **minimum** of \$50,000.00. There is no maximum award amount if an applicant’s need and impact are demonstrated.

All grants will be made on an annual cycle. Those applicants who apply for and are awarded HOME-ARP Supportive Services funds (Grantees) will enter into a funding agreement with DOA. The funding agreements of such Grantees who demonstrate successful implementation of the program and are compliant with DEHCR and HUD rules and regulations will be automatically renewed for an additional twelve (12) months. After the initial two (2) funding cycles all Grantees will be required to apply within the regular funding cycle. The initial funding cycle will begin on May 1, 2024 and end June 30, 2025. All succeeding grant cycles will consist of a 12-month grant period through June 30, 2030. Assistance may not extend beyond this period.

## Chapter 2: Application Process

### 1. Eligible Applicants

Eligible applicants are limited to local government agencies, elected governing bodies of federally recognized American Indian tribes or bands in the State of Wisconsin, governing bodies of a county, city, village, or town, housing authorities, private/not-for-profit organizations, or religious societies as defined under Chapter 187 of the Wisconsin Statutes. Applicants are also required to be subscribers of HMIS or a comparable database.

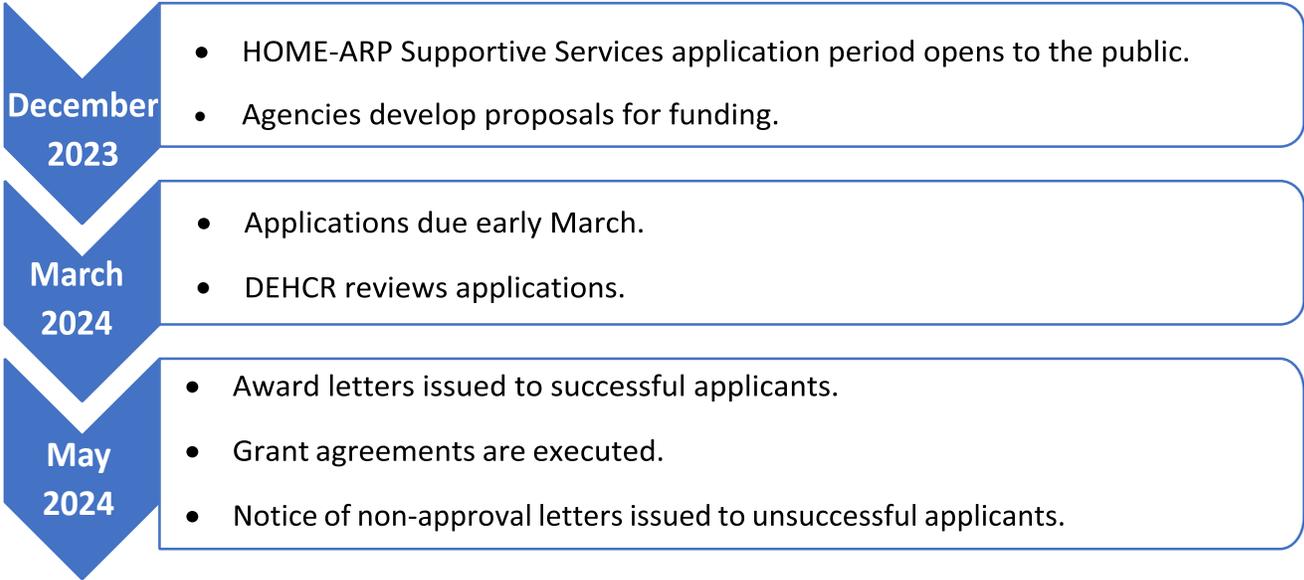
DEHCR does not award HOME-ARP funds in participating jurisdictions or consortia regions that receive HOME funds directly from HUD. For reference, HOME-ARP funding may not be distributed in the following areas:

Participating Jurisdiction Cities:	HOME/HOME-ARP Consortia
Eau Claire	Dane County
Green Bay	Janesville Consortium (Rock County)
Kenosha	Milwaukee County Consortium
La Crosse	Waukesha County Consortium (Waukesha, Jefferson, Washington, Ozaukee Counties)
Madison	
Milwaukee	
Racine	

DEHCR may fund activities in the tan areas highlighted on the map found on page 113 of the Division’s [2020-2024 Fair Housing Plan](#). Please contact the HOME-ARP Grants Specialist (madalyn.grau@wisconsin.gov) if there are any concerns or questions about the proper participating jurisdiction that will administer HOME-ARP funds within the State of Wisconsin.

**2. Application Timeline**

The independent HOME-ARP Supportive Services application timeline is as follows and is subject to change:



## Chapter 3: Program Requirements

### 1. Participant Eligibility – HOME-ARP Supportive Services Qualifying Populations

The HOME-ARP Supportive Services activity has a narrow definition of who can be served. The program is focused on providing “Qualifying Population” households wrap-around services to help them remain housed. The following four (4) Qualifying Populations are eligible to receive services and are defined below:

- “Homeless” as defined under 24 CFR § 91.5;
- “At-risk of homelessness” as defined under 24 CFR § 91.5;
- Those fleeing or attempting to flee “domestic violence”, “dating violence”, “sexual assault”, “stalking,” or “human trafficking” as defined under 24 CFR § 5.2003 or the Trafficking Victims Protection Act of 2000.
- “Other populations” – where supportive services or assistance would prevent a family’s homelessness or serve those with the greatest risk of housing instability, as defined in Section IV of CPD 21-10.
- Veterans and families that include a veteran member that meet one of the preceding criteria.

#### Homeless

For the purposes of the HOME-ARP Supportive Services program, the designation of “homeless” requires meeting one (1) of the following three (3) definitions:

1. An individual or family who:
  - a. Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or
  - b. Is living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organization or by federal, state, or local government programs for low-income individuals); or
  - c. Is exiting an institution where he or she 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.
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
  - a. The primary nighttime residence will be lost within 14 days of the date of application for assistance; and
  - b. No subsequent residence has been identified; and

- c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing.
3. Families with children and youth, or unaccompanied youth under 25 years of age, who do not otherwise qualify as homeless as defined in 1 or 2 above, but who:
- a. Are defined as homeless under Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. § 5732a), Section 637 of the Head Start Act (42 U.S.C. § 9832), Section 41403 of the Violence Against Women Act of 1994 (34 U.S.C. § 12473)), Section 330(h) of the Public Health Service Act (42 U.S.C. § 254b(h)), Section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. § 2012), Section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. § 1786(b)), or Section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11434a);
  - b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - c. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - d. Can be expected to continue in such status for an extended period of time because of:
    - i. Chronic disabilities;
    - ii. Chronic physical health or mental health conditions;
    - iii. Substance addiction;
    - iv. Histories of domestic violence or childhood abuse or neglect;
    - v. The presence of a child or youth with a disability; or
    - vi. Two or more of the following barriers to employment:
      - 1. Lack of a high school degree or General Educational Development (GED);
      - 2. Illiteracy;
      - 3. Low English proficiency;
      - 4. History of incarceration or detention for criminal activity;
      - 5. A history of unstable employment.

**At Risk of Homelessness**

For the purposes of the HOME-ARP Supportive Services program, “at risk of homelessness”

requires meeting one (1) of the following two (2) definitions:

1. An individual or family who:
  - a. Has an annual income below 30 percent of median family income, adjusted for household size, for the area, as determined by HUD; and
  - b. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or a public or private place not meant for use as a regular sleeping accommodation by human beings; and
  - c. Meets one of the following conditions:
    - i. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homeless assistance;
    - ii. Is living in the home of another because of economic hardship;
    - iii. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - iv. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
    - v. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S Census Bureau;
    - vi. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution).
2. A child or youth who does not qualify as homeless as defined above, but qualifies as homeless because they are:
  - a. An individual under 18 years of age who cannot live safely with a parent, legal guardian, or relative, and has no other safe alternative living arrangement.
  - b. An individual who has a primary nighttime residence that provides a temporary residence for individuals intended to be institutionalized or has a temporary accommodation for not more than 90 days in the residence of another individual.

## **Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

For the HOME-ARP Supportive Services program, this Qualifying Population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. *There is no requirement that individuals and families also meet the HOME-ARP Supportive Services program definition of homeless, at risk of homelessness, or “other” Qualifying Population.*

This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.

In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for assistance.

### *Domestic Violence*

Domestic violence includes felony or misdemeanor crimes of violence committed by:

1. A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
2. A person with whom the victim shares a child in common;
3. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
4. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the State of Wisconsin; or
5. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the State of Wisconsin.

### *Dating Violence*

Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of the relationship is determined considering:

1. The length of the relationship;
2. The type of relationship; and
3. The frequency of interaction between the persons involved in the relationship.

### *Sexual Assault*

Sexual assault means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

### *Stalking*

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person's individual safety or the safety of others; or
2. Suffer substantial emotional distress.

### *Human Trafficking*

For the purposes of the HOME-ARP Supportive Services program, human trafficking includes both sex and labor trafficking, defined as:

1. For sex trafficking, the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.
2. For labor trafficking, the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

### **“Other” Qualifying Population**

For the purposes of the HOME-ARP Supportive Services program, “other” Qualifying Population means individuals and families who do not meet the definition of homeless, at-risk of homelessness, or fleeing or attempting to flee domestic violence, dating violence, sexual

assault, stalking or human trafficking as defined above and:

1. Require services or housing assistance to prevent repeat homelessness; or
2. At greatest risk of housing instability.

#### *Households Requiring Services or Housing Assistance to Prevent Repeat Homelessness*

Households may receive HOME-ARP Supportive Services or housing assistance as a HOME-ARP Qualifying Population if they meet all of the following three (3) eligibility criteria:

1. Previously qualified as homeless as defined above, or previously qualified as homeless because:
  - a. The individual or family was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or family member including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and
  - b. Have no other residence; and
  - c. Lack the resources or support networks, such as family, friends, faith-based or other social networks, to obtain other permanent housing; **and**
2. Are currently housed with temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed; **and**
3. Need additional housing assistance or supportive services to avoid a return to homelessness.

#### *Households at Greatest Risk of Housing Instability*

Households are at greatest risk of housing instability and a HOME-ARP Supportive Services Qualifying Population when they meet one (1) of the following two (2) definitions:

1. Have an annual income that is less than or equal to 30% of the County Median Income (CMI) and are paying more than 50% of monthly household income toward housing costs (are severely cost burdened); **or**
2. Have annual income that is less than or equal to 50% of the CMI, **and** meet **one** (1) of the following conditions:
  - a. Moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - b. Living in the home of another because of economic hardship;

- c. Have been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau; or
- f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution).

## 2. Eligibility Screening & Documentation

All HOME-ARP Supportive Services activities must use the Continuum of Care's Expanded Coordinated Entry (ECE) system to screen and identify qualifying service households. The HOME-ARP ECE process is expanded from typical Coordinated Entry to specifically include the Qualifying Populations described in this Program Manual and CPD Notice 21-10.

### Establishing Expanded Coordinated Entry List

Each HOME-ARP Supportive Services Grantee will be required to establish an Expanded Coordinated Entry list in coordination with the HUD-recognized Continuum of Care (CoC) in their service area. A written agreement between the project and CoC must be established and maintained throughout the grant agreement period.

### Screening

Households will be screened by the Expanded Coordinated Entry staff to ensure qualification as a HOME-ARP Supportive Services Qualifying Population. Such information must then be entered into the Expanded Coordinated Entry list for the program.

### Expanded Coordinated Entry Process for Qualifying Population Units

1. Qualified applicants will be pulled from the Expanded Coordinated list based on preference.
  - a. A preference for specific Qualifying Populations may be identified, but this preference does not act as a limitation. Specific Qualifying Populations may be prioritized in a list of qualified applicants, but if there are no households from that population eligible for the services, services must be made available to the next qualifying household that submitted their completed application from the project waitlist, in chronological order.
  - b. The State of Wisconsin's HOME-ARP Allocation allows for the adoption of any of the following preferences for HOME-ARP Supportive Services activities:
    - Preference #1: Individuals experiencing homelessness, as defined in 24 CFR § 91.5.
    - Preference #2: Individuals at risk of homelessness, as defined in 24 CFR § 91.5.
    - Preference #3: Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD.

- c. Programs with preferences will select individuals and families from the Expanded CE system using the prioritization process established by the CoC.
2. In the case that there are no households from preferred Qualifying Populations, all other Qualifying Population households become eligible to receive supportive services.
  - a. Members of the “Other” Qualifying Population will still be able to apply for all HOME-ARP funded projects, including those that have stated preferences. Additionally, all Qualifying Populations may be referred to and apply for any HOME ARP program.

### 3. Maximum Term of Supportive Services for Qualifying Populations

Program participants are not required to accept supportive services as a condition of occupancy or tenancy and may request services at any time during occupancy or tenancy subject to availability and HOME-ARP Supportive Services program time limitations. Changes in income shall not impact a program participant’s status as a Qualifying Population. Once a household qualifies as a Qualifying Population household, they hold that status and must be served by the HOME-ARP Supportive Services program until the earlier of September 30, 2030, or until the individual or family:

1. Voluntarily terminates HOME-ARP Supportive Services; or
2. Obtains needed supportive services from another source.

Otherwise, maximum service periods may be determined by the Grantee and must apply to all program participants once they are designated as a Qualifying Population. A maximum term of service policy will be required for all Grantees.

### 4. Overview of Eligible Activities & Reimbursable Costs

HOME-ARP Supportive Services funding is available for the following eligible services for Qualifying Populations, including those who are tenants or prospective tenants of HOME-ARP Rental Housing (more information on HOME-ARP Rental Housing available on [DEHCR’s HOME-ARP webpage](#).) Services may only be offered to households (individuals or families) that meet the definition of a Qualifying Population at the time of application for services, in order determined by the Expanded Coordinated Entry Process. Eligibility must be documented prior to providing HOME-ARP Supportive Services funded services.

These services can be offered as a separate activity or in conjunction with rental housing development activity. Households may not already be receiving these services through another program. A more detailed description of eligible services is available in [CPD Notice 21-10](#).

There are three (3) categories of eligible supportive services:

- McKinney Vento
- Homelessness Prevention
- Housing Counseling

All qualifying individuals and families are eligible to receive supportive services under the supportive services activity. The Grantee must establish requirements for documenting eligible costs for an individual or family in a Qualifying Population as McKinney-Vento supportive services, homelessness prevention services, or housing counseling as appropriate. If a person is homeless, then the person is eligible to be provided the supportive services as McKinney-Vento supportive services for the costs allowable under the notice. If such program participant falls under any of the other Qualifying Populations, then all costs must be documented as homeless prevention costs. Housing counseling by a HUD-certified counseling agency must also be documented as such regardless of which Qualifying Population the recipient household qualifies as.

## 5. Eligible Services

1. The following are classified as McKinney Vento/Homelessness Prevention Services for the purposes of the HOME-ARP Supportive Services program:

- A. Assessment of service needs, and existing services secured by the individual or family.
- B. Benefits and services navigation.
- C. Food, limited to meals or groceries, for program participants.
- D. Housing stability case management, limited to:
  - i. Counseling;
  - ii. Developing, securing, and coordinating services including federal, state, and local benefits;
  - iii. Monitoring and evaluating program participant progress;
  - iv. Providing information and referrals to other providers; and
  - v. Developing an individualized housing and service plan.
- E. Childcare, including providing meals and snacks, and comprehensive and coordinated developmental activities.
  - i. The childcare center must be licensed by the jurisdiction in which it operates.
  - ii. Children must be under the age of 13 unless the children have a disability.
  - iii. Children with a disability must be under the age of 18.
- F. Education services to improve knowledge and basic educational skills, limited to:
  - i. Individual or group instruction or training in:
    - a. Consumer education;

- b. Health education;
    - c. Substance abuse prevention;
    - d. Literacy;
    - e. English as a Second Language; and
    - f. General Educational Development (GED).
  - ii. Screening, assessment, and testing;
  - iii. Tutoring;
  - iv. Provision of books, supplies, and instructional material;
  - v. Counseling; and
  - vi. Referral to community resources.
- G. Employment assistance and job training, including the costs of establishing and/or operating employment assistance and job training programs. Employment and job training programs may be provided in a classroom, online and/or as computer instruction, or as on-the-job instruction limited to:
  - i. Services that assist individuals in securing employment, including:
    - a. Employment screening, assessment, or testing;
    - b. Structured job skills and job-seeking skills;
    - c. Special training and tutoring, including literacy training and prevocational training;
    - d. Books and instructional material;
    - e. Counseling or job coaching; and
    - f. Referral to community resources.
  - ii. Services that assist individuals in acquiring learning skills, including skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates; and
  - iii. Reasonable stipends to program participants in employment assistance and job training programs.
- H. Housing search and counseling services that are provided as part of a larger set of holistic case management services and that assist program participants to locate, obtain, and retain suitable housing, limited to:
  - i. Development of an action plan for locating housing;
  - ii. Housing search assistance;
  - iii. Tenant counseling;
  - iv. Securing utilities;
  - v. Making moving arrangements;
  - vi. Outreach to and negotiation with owners/property managers/landlords;
  - vii. Assistance submitting rental applications and understanding leases;
  - viii. Mediation with property owners and landlords on behalf of eligible

- program participants;
  - ix. Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
  - x. Payment of rental application fees.
- I. Legal services, including participant intake, receiving, and preparing cases for trial, provision of legal advice, representation at hearings, and counseling, that are provided by a licensed attorney or a person under the direct supervision of a licensed attorney. Filing fees and other necessary court costs.
- i. Fees based on the actual service performed (i.e., fee for service) are eligible only if the cost would be less than the cost of hourly fees. Retainer fee arrangements and contingency fee arrangements are prohibited.
  - ii. If the contractor is a legal services provider and performs the services itself, the eligible costs are the contractor's employees' salaries and other costs necessary to perform the services. All costs must be directly attributable to a HOME-ARP Supportive Services program participant.
  - iii. Legal services for immigration and citizenship matters and for issues related to mortgages and homeownership are ineligible.
  - iv. Legal services must be necessary to assist a qualifying household to obtain housing and are limited to the following subject matters.
    - a. Child support;
    - b. Guardianship;
    - c. Paternity;
    - d. Emancipation;
    - e. Legal separation;
    - f. Orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking;
    - g. Appeal of veterans and public benefit claim denials;
    - h. Landlord-tenant disputes; and
    - i. Resolution of outstanding criminal warrants when those warrants are prohibiting the program participant from obtaining permanent housing.
- J. Life skills training, including teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, dating violence, sexual assault, stalking, human trafficking, substance abuse, and homelessness. These services must be necessary to assist the program participant to function independently in the community.
- K. Mental health services provided on an outpatient basis by licensed professionals

that apply therapeutic processes to personal, family, situational, or occupational problems to bring about positive resolution of the problem or improved individual or family functioning or circumstances, limited to:

- i. Crisis interventions;
  - ii. Counseling;
  - iii. Individual, family, or group therapy sessions;
  - iv. The prescription of psychotropic medications or explanations about the use and management of medications; and
  - v. Combinations of therapeutic approaches to address multiple problems.
- L. Outpatient health services provided by licensed medical professionals to treat medical conditions, limited to:
- i. Analysis or assessment of a program participant's health problems and the development of a treatment plan;
  - ii. Assisting program participants to understand their health needs;
  - iii. Providing directly or assisting program participants to obtain and utilize appropriate medical treatment;
  - iv. Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
  - v. Provision of appropriate medication;
  - vi. Necessary follow-up services; and
  - vii. Preventive and non-cosmetic dental care.
- M. Substance abuse treatment services by licensed or certified professionals to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors, limited to:
- i. Intake and assessment;
  - ii. Outpatient treatment;
  - iii. Group and individual counseling; and
  - iv. Drug testing.
- N. Transportation, limited to:
- i. The costs of program participant's travel on public transportation or in a vehicle provided by the service organization to and from medical care, employment, childcare, or HOME-ARP Supportive Services eligible supportive services;
  - ii. Mileage allowance for service workers to visit program participants and to carry out housing inspections; and
  - iii. The costs of staff to accompany or assist program participants to utilize public transportation.
- O. Case management, including assessing, arranging, coordinating, and monitoring

the delivery of individualized services to meet the needs of program participant(s), limited to:

- i. Conducting an initial evaluation, including verifying and documenting eligibility;
  - ii. Counseling;
  - iii. Developing, securing, and coordinating services;
  - iv. Obtaining federal, state, and local benefits;
  - v. Monitoring and evaluating program participant progress;
  - vi. Providing information and referrals to other providers;
  - vii. Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
  - viii. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
  - ix. Conducting re-evaluations of the program participant's eligibility and the types and amounts of assistance the program participant needs.
- P. Credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- Q. Landlord/Tenant liaison services between property managers/owners and program participants, limited to:
- i. Landlord outreach;
  - ii. Physical inspections as needed to secure units;
  - iii. Rental application fees and security deposits; and
  - iv. Coordination with other HOME-ARP eligible services to assist participants to maintain permanent housing.
- R. Mediation: HOME-ARP Supportive Services funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- S. Financial assistance costs: HOME-ARP Supportive Services funds may be used to pay housing owners, utility companies, and other third parties for the following costs, as applicable:
- i. Rental application fees: Rental housing application fee that is charged by the owner to all applicants.
  - ii. Security deposits: A security deposit that is equal to no more than 2 months' rent. This assistance is separate and distinct from the provision of

financial assistance for first and last month's rent provided under this section and cannot be used to duplicate those costs.

- a. If providing financial assistance for security deposit, Grantee must complete unit inspection prior to entering financial assistance agreement with owner. Grantee may use the following standards for unit inspection:
    - Habitability inspection (per 24 CFR § 576.403) or
    - Housing Quality Standard inspection (24 CFR § 982.401) / NSPIRE inspection (described in PIH Notice 2023-28)
  - b. Housing Quality Standards may be used through September 30, 2024. Any inspection completed after October 1, 2024 must use NSPIRE Inspection Standards.
  - c. Documentation of passing unit inspection must be included in participant file.
- iii. Utility deposits: HOME-ARP Supportive Services funds may pay for a standard utility deposit or initiation fee required by the utility company or owner (if owner-paid utilities are provided) for all program participants for the following utilities:
- a. Gas
  - b. Electric
  - c. Water
  - d. Sewer
- iv. Utility payments: HOME-ARP Supportive Services funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
- v. Moving costs: HOME-ARP Supportive Services funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not

eligible.

- vi. First and last month's rent: If necessary to obtain housing for a program participant, HOME-ARP Supportive Services funds may be used to make a pre-payment of the first and last month's rent under a new lease to the owner at the time the owner is paid the security deposit for the program participant's tenancy in the housing. This assistance must not exceed two month's rent and must be tracked for purposes of determining the total short- and medium-term financial assistance for rent that the program participant may receive. This assistance is separate and distinct from financial assistance for security deposits provided under this section and cannot be used to duplicate those costs.
    - a. If providing financial assistance for first and last month's rent, a Grantee must complete unit inspection prior to entering financial assistance agreement with owner. Grantee may use the following standards for unit inspection:
      - Habitability inspection (per 24 CFR § 576.403) or
      - Housing Quality Standard inspection (24 CFR § 982.401) / NSPIRE inspection (described in PIH Notice 2023-28)
      - Housing Quality Standards may be used through September 30, 2024. Any inspection completed after October 1, 2024, must use NSPIRE Inspection Standards.
    - b. Documentation of passing unit inspection must be included in participant file.
  - vii. Payment of rental arrears: HOME-ARP Supportive Services funds may be used for a one-time payment for up to 6 months of rent in arrears, including any late fees or charges on those arrears, if necessary for the household to maintain their existing housing or, for those without housing, if necessary to remove a demonstrated barrier to obtaining housing.
- T. Short-term and medium-term financial assistance for rent: Subject to the following conditions, the service agency may provide a program participant with short-term or medium-term financial assistance for rent, provided that the total financial assistance provided, including any pre-payment of first and last month's rent as described above, does not exceed 24 months of rental payments over any 3-year period.
- i. Short-term means up to 3 months.
  - ii. Medium-term means more than 3 months but not more than 24 months.
  - iii. The Grantee may make rental payments only to an owner with whom the agency has entered into a financial assistance agreement for rental

payment. The financial assistance agreement must set forth the terms under which rental payments will be provided. The financial assistance agreement must provide that, during the term of the agreement, the owner must give the Grantee a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant. The owner must serve written notice upon the program participant at least 30 days before termination of tenancy specifying the grounds for the action. Each financial assistance agreement that is executed or renewed must comply with the requirements in 24 CFR § 92.359. This agreement must be reserved in Grantee files for monitoring purposes.

- iv. The Grantee must make timely payments to each owner in accordance with the financial assistance agreement. The financial assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The agency is solely responsible for paying with non HOME-ARP funds any late payment penalties that it incurs.
- v. Rental payments cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR Part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR § 982.507.
- vi. Each program participant receiving financial assistance for rental payments must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the financial assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. New leases must have an initial term of 1 year unless a shorter period is agreed upon by the program participant and owner. The lease requirements in 24 CFR § 92.359 apply to this financial assistance. A copy of the lease must be retained in the participant's files for monitoring purposes.
- vii. Grantee must establish requirements to prevent the provision of short- or medium-term financial assistance for rent for the same period for which a program participant is receiving rental assistance or living in housing provided with ongoing assistance (such as the Wisconsin Emergency Rental Assistance program, project-based rental assistance, or operating

subsidies).

- viii. If a program participant receiving financial assistance for short- or medium-term rental payments under this section meets the conditions for an emergency transfer under 24 CFR § 5.2005(e), HOME-ARP Supportive Services funds may be used to pay amounts owed for breaking a lease to effectuate an emergency transfer. These costs are not subject to the 24-month limit on rental payments.
- ix. If providing short or medium-term financial assistance for rent, Grantee must complete unit inspection prior to entering into a financial assistance agreement with owner. Grantee may use the following standards for unit inspection:
  - a. Habitability inspection (per [24 CFR § 576.403](#)) or
  - b. Housing Quality Standard inspection ([24 CFR § 982.401](#)) / NSPIRE inspection (described in [PIH Notice 2023-28](#))
    - Housing Quality Standards may be used through September 30, 2024. Any inspection completed after October 1, 2024 must use NSPIRE Inspection Standards.
- x. Documentation of passing unit inspection must be included in participant file.

2. The following describes Housing Counseling Services:

- a. Eligible costs associated with housing counseling: Costs associated with housing counseling services under 24 CFR § 5.111 are eligible under the HOME-ARP Supportive Services program. As homeowner assistance and related services are not eligible HOME-ARP Supportive Services program activities, costs for the provision of services related to mortgages and homeownership to existing homeowners are also not eligible under the HOME-ARP Supportive Services program. Eligible costs are those costs associated with the services listed in 24 CFR Part 214 and include, but are not limited to:
  - Staff salaries and overhead costs of HUD-certified housing counseling agencies related to directly providing eligible housing counseling services to HOME-ARP program participants;
  - Development of a housing counseling workplan;
  - Marketing and outreach;
  - Intake;
  - Financial and housing affordability analysis;

- Action plans that outline what the housing counseling agency and the participant will do to meet the participant's housing goals and that address the participant's housing problem(s);
  - Follow-up communication with program participants.
- b. Housing counseling provided for the following topics is ineligible under the HOME-ARP Supportive Services program:
- Resolving or preventing mortgage delinquency, including, but not limited to default and foreclosure, loss mitigation, budgeting, and credit;
  - Home maintenance and financial management for homeowners, including, but not limited to: Escrow funds, budgeting, refinancing, home equity, home improvement, utility costs, energy efficiency, rights and responsibilities of homeowners, and reverse mortgages.
- c. When agencies provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of “Housing Counseling”, as defined in [24 CFR § 5.100](#), and therefore are not required to be carried out in accordance with the certification requirements of [24 CFR § 5.111](#).

McKinney Vento/Homelessness Prevention Supportive Services and Housing Counseling Service activities must be tracked separately for reporting purposes. The Grantee will be called to report on each, in terms of participants served and funding spent.

## 6. Administrative Funds

Administrative costs are eligible under this program but are limited to no more than 15% of the total award. These funds may only be used to pay the costs of administering the HOME-ARP Supportive Services program.

## 7. Non-Reimbursable Costs

HOME-ARP Supportive Services funds may not be spent on the following:

- Anything not explicitly stated as allowable under the grant terms.
- Alcoholic beverages.
- 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.

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources. If it is found a Grantee used grant funds for any of the above outlined non-reimbursable items/activities, the Grantee will be required to repay to DOA 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 any grant agreement executed under the HOME-ARP Supportive Services program. Grantees may choose to provide all services directly or may sub-contract to another public, private, or non-profit organization. The Grantee must maintain primary responsibility for all grant agreement terms and conditions.

If the Grantee decides to subcontract, they must ensure that any and all subcontracts list all program requirements identified in the Grantee's contract and program application. A grantee must also monitor their sub-recipient at least once during the performance period to ensure compliance. This monitoring must include a review of participant files, procedures, policies, and financials as outlined in [Chapter 8: Annual Monitoring](#) of this Program Manual. The Grantee must also develop a payment process for disbursing HOME-ARP Supportive Services payments within thirty (30) days of receiving the payment from DEHCR to the sub-recipient.

### 2. Contract Amendments

Grantees may amend their grant agreements only with written approval from DEHCR. Grant agreement amendments cannot extend the performance period, nor can they increase or decrease the total budget. They can only change the allocation split between fund types. To request a grant agreement amendment, HOME-ARP Supportive Services Grantees are encouraged to consult with the HOME-ARP Grant Specialist (contact information is available on [DEHCR's website](#)) and then electronically submit:

- A written request defining and justifying the changes being requested.
- An amended allocation split between case management and administrative funds

DEHCR must receive all grant agreement amendment requests no later than thirty (30) days before the end of the performance period of the Grantee's grant agreement.

### 3. Homeless Management Information Systems or Comparable Database Requirements

As a condition of funding, Grantees are required to use either the Homeless Management Information System (HMIS) database or an HMIS comparable database (if they are a victim service provider).

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.

These databases are used to measure the scope of homelessness in Wisconsin, track service delivery, and help evaluate the effectiveness of service interventions. Grantees will be required to provide Quarterly Reports and Annual Reports leveraging HMIS. See Chapter 7: Reporting of this Program Manual for further information.

#### 4. Expanded Coordinated Entry Requirement

Coordinated Entry refers to a single place or process for people to access homelessness prevention, housing, and related services within a given CoC. HUD COCs are required to develop a system for CE and Grantees are required to participate in CE. HOME-ARP CE is expanded to properly include the specific HOME-ARP Qualifying Populations and is therefore referred to as Expanded Coordinated Entry (ECE). Grantees must use any applicable HOME-ARP ECE procedures to evaluate participant eligibility for the HOME-ARP Supportive Services program in partnership with a local CoC. Documents demonstrating participant eligibility as a Qualifying Population, screened using the HOME-ARP ECE process, must be included in participant files.

#### 5. Required Participant File Elements

A participant file must be created for each participant in the HOME-ARP Supportive Services program. The participant file must contain the following:

1. Screening documentation, initial assessment and/or application through the ECE process.
2. Documentation certifying that services are not duplicated by another public source.
3. Documentation of services provided and referrals made.
4. Participant signed receipt of receiving the supportive service program termination policy and procedure, as well as any correspondence related to a termination proceeding, if applicable.
5. If financial assistance is provided for security deposits, first and last months' rent, and short or medium-term rental assistance using HOME-ARP Supportive Services funding, the following materials must be preserved in participant files:
  - a. Lease and rental assistance agreements must be preserved in participant files.
  - b. Documents asserting that rental assistance is not used in a unit where tenant is receiving other rental assistance directly or through a project-based subsidy or other source of funds.
  - c. Documentation that unit complied with FMR and/or rent reasonableness limits.

- d. Records evidencing unit inspections for these forms of assistance are also required as:
  - i. HUD-provided forms for [Habitability \(for Permanent Housing\)](#),
  - ii. HQS ([HUD-52580A](#) or [HUD-52580](#))(before September 30, 2024) or;
  - iii. [NSPIRE](#) (if after October 1, 2024) to verify record that assistance was provided to a passing unit.
- 6. Entry and exit (if applicable) dates from program in HMIS (or comparable database) using screenshots.

When sharing participant files with DEHCR, all Personally Identifiable Information (PII) including participant names must be redacted and all copies of security cards, driver’s licenses, birth certificates, etc. must be removed. Copies of these documents should never be kept in participant files. All participants’ files must be shared with DEHCR through secure means. They cannot be emailed.

## 6. 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 yearly monitoring.

### 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. Anti-Lobbying Requirements

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

### 3. Participant Prioritization Documentation

Each Grantee must have written documentation outlining how eligible individual families will be prioritized within the Expanded Coordinated Entry process, and how it will be decided which of those families ultimately enter the HOME-ARP Supportive Services program. While households who meet the Grantee’s preference must be prioritized, all Qualifying Populations must be served, in chronological order of application.

### 4. Participant Termination Policy

The Grantee must establish policies and procedures for termination of assistance to program participants. In terminating assistance to a program participant, the Grantee

must provide a formal process that recognizes the rights of individuals receiving assistance under due process of law. This process, at a minimum, must consist of:

- i. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
- ii. Written notice to the program participant containing a clear statement of the reasons for termination;
- iii. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- iv. Prompt written notice of the final decision to the program participant.

During this process, the Grantee must provide effective communication and accessibility for individuals with disabilities, including the provision of reasonable accommodations. Similarly, the Grantee must provide meaningful access to persons with Limited English Proficiency (LEP).

#### 5. Confidential, Proprietary and Personally Identifiable Information Policy:

All Grantees must develop and implement written confidentiality procedures to ensure:

- All records containing personally identifying information of any person or family who applies for and/or receives HOME-ARP Supportive Services assistance will be kept secure and confidential.
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the HOME-ARP Supportive Services program will not be made public except with written authorization of the person responsible for the operation of the program.
- 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 funded under the HOME-ARP Supportive Services program, 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.

#### 6. 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 HOME-ARP Supportive Services assistance on a participant's acceptance of housing or another good or service owned by the Grantee, a parent company of the Grantee, or a subsidiary of the Grantee.

##### Individual Conflict of Interest

The individual conflict of interest regulations prohibit financial gain for self, family, or those with business ties. No person who exercises responsibility over HOME-ARP Supportive Services funds or who is in a position to participate in a decision-making process or gain inside information with regard to HOME-ARP Supportive Services funds 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 [2 CFR Part 200, Subpart D](#) apply. These regulations require Grantees to maintain written standards governing the performance of their employees engaged in awarding and administering federally funded contracts. At a minimum, these standards must:

- Require that no employee, officer, agent of the Grantee participate in the selection, award, or administration of a contract supported by HOME-ARP Supportive Services 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 to DOA any HOME-ARP Supportive Services funds disbursed for which there is an identified conflict of interest unless an exception is granted by DEHCR.

#### 7. Contractual Responsibility:

Grantees must maintain primary responsibility for all contractual issues. Program delivery may be subcontracted out. If a Grantee decides to subcontract, they must ensure all program requirements identified in the Grantee's grant agreement and program application are included in the terms and conditions of any subcontract. A Grantee must also monitor their sub-recipient at least once during the performance period to check for compliance. This monitoring must include a review of participant files, procedures, policies, and financials.

#### 8. 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 (DOA) will be notified within 10 days after the Grantee receives notice that a covered employee (an employee supported with grant funds) has been convicted of a criminal drug violation in the workplace.

#### 9. Equal Access

Grantees must have policies and practices to ensure participants have equal access to services as required under Wisconsin's civil rights laws including, but not limited to, sexual orientation, gender identity, family composition or marital status.

Further, Grantees will be required to complete [HUD's Equal Access Agency Assessment Tool](#) and submit the results to DEHCR during monitoring.

#### 10. 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 white, and then identify the percentage of its participant population that is BIPOC compared to White. If there is an imbalance in the BIPOC/White percentage split between the participant population compared to the service territory's homeless population, outreach strategies to the underrepresented participant population group must be developed and implemented.

#### 11. Financial Management

All funding sources from DOA are to be tracked separately. Payroll expenses should include documentation from timesheet to paycheck. Timesheets should show hours

spent on HOME-ARP Supportive Services eligible activities vs. other non-HOME-ARP activities. The Grantee should establish policies and procedures for keeping backup documentation on expenditures so it can be produced upon request.

#### 12. Financial Statements

The Grantee is required to provide access to financial statements and expenditure records upon request by representatives of DOA, HUD, and the Wisconsin Legislative Audit Bureau (LAB).

#### 13. Monitoring

The Grantee shall comply with monitoring visits and/or desk monitoring from representatives of DOA, HUD, and LAB to ensure HOME-ARP Supportive Services program compliance.

#### 14. No Faith Based Activities Requirements or Religious Influence

All HOME-ARP Supportive Services 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 HOME-ARP Supportive Services 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 HOME-ARP Supportive Services program, and participation must be voluntary for HOME-ARP Supportive Services program participants.

#### 15. Non-Discrimination Policy for Participants & Employees

Each Grantee must have a policy expressly stating that discrimination against participants/potential participants 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 participants/potential participants and employees/potential employees

to report discrimination, and potential repercussions for those who engage in discrimination.

#### 16. Recordkeeping and Retention

Grantees must retain all program files and records (including participant files) for a minimum of five (5) years after the end of the grant agreement period of performance. All files must be available for review or audit upon request from DOA, HUD, and LAB. Often the turnaround for file requests is short; therefore, files must be readily accessible so they can be provided within the timeframe requested.

#### 17. Residency

The Grantee shall not require individuals or families experiencing homelessness to be residents of the State of Wisconsin or locality to receive support services, nor shall the Grantee set differing allowed lengths of stay based on whether an individual or family experiencing homelessness are residents of the State of Wisconsin or locality.

#### 18. Signing Authority Documentation

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

#### 19. Trauma-Informed Care Practices

Recognizing that most HOME-ARP Supportive Services participants have experienced a variety of traumas, 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.

#### 20. Maximum Term of Service Policy

Program participants are not required to accept supportive services as a condition of occupancy or tenancy and may request services at any time during occupancy or tenancy subject to availability as well as HOME-ARP Supportive services time limitations. Changes in income do not impact a participant's status as a Qualifying Population. Once a household qualifies as a Qualifying Population household, they hold that status and must be served in the HOME-ARP Supportive Services program until the earlier of September 30, 2030, or until the individual or family:

1. Voluntarily terminates HOME-ARP supportive services; or
2. Obtains needed supportive services from another source.

Otherwise, maximum service periods may be determined by the organization and must apply to all participants once they are designated as a Qualifying Population. A maximum term of service policy will be required for all Grantees.

## Chapter 5: Financial Management

### 1. Tracking of Funds

All funding sources from DOA are to be tracked separately. Additionally, while all qualifying households are eligible to receive HOME-ARP Supportive Services, the Grantee must establish requirements for documenting all eligible costs for an individual or family in a qualifying population as McKinney-Vento Supportive Services/ Homeless Prevention Services, or Housing Counseling Services.

Services benefiting households who are homeless are identified as McKinney-Vento services. Supportive services benefiting households who are currently housed must be labeled as Homeless Prevention Services. Housing Counseling Services provided by a HUD-certified housing counseling agency, regardless of the Qualifying Population, must be identified as Housing Counseling Services.

Grantees are required to provide access to financial statements, charts of accounts, and expenditure records upon request by representatives of DOA, HUD, and LAB.

HOME-ARP Supportive Services Housing Counseling Services projects, as defined in 24 CFR Part 5, require each participating housing counseling agency to maintain a recordkeeping and reporting system in accordance with 24 CFR § 214.315 and 24 CFR § 214.317. The system must permit HUD to easily access all information needed for a performance review.

### 2. 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 and if the Grantee is also the recipient of State of Wisconsin funds under the same or a separate contract program, then the State of Wisconsin funded programs shall also be included in the scope of the federally required audit. Governmental and non-profit Grantees, or their assignees, who have received State of Wisconsin funds during their fiscal year shall comply with the requirements set forth in the State Single Audit Guidelines issued by DOA. Audit reports are due to DOA within the earlier of thirty (30) calendar days after receipt of the auditor's report(s), or nine (9) months after the end of the audit period.

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

## Chapter 6: Quarterly Funds Disbursement & Financial Updates

Grantees may draw on HOME-ARP Supportive Services funds as reimbursement of expenditures. To initiate each payment, Grantees must complete and submit the HOME-ARP Payment Request form on or before the fifteenth (15<sup>th</sup>) of the month following the close of the quarter. This Payment Request Form may also contain reporting on other HOME-ARP funded activities. Grantees are also allowed to submit monthly, on or before the fifteenth (15<sup>th</sup>) of the month, for the previous month's expenses. Grantees must submit at least one (1) Payment Request every quarter.

DEHCR reserves the right to not process Payment Requests until Quarterly Reporting and Quarterly Financial Updates have been submitted. Quarterly Reporting and Quarterly Financial Updates are due with submission of the Payment Request for the last month in the quarter's expenses, whether the Grantee is submitting Payment Requests quarterly or monthly. DEHCR reserves the right to change this policy.

The Quarterly Financial Update must cover two topics:

1. When the Grantee expects to draw on HOME-ARP Supportive Services funds next.
2. If the Grantee foresees any issues with spending the full amount awarded within the performance period.

Grantees will be expected to provide a Quarterly Financial Update until they have exhausted all funds. Similarly, Quarterly Reporting is due each quarter regardless of whether the Grantee is submitting a Payment Request or has already exhausted all funds.

Payment Requests must be submitted by email to [DOADEHCRFiscal@wisconsin.gov](mailto:DOADEHCRFiscal@wisconsin.gov) copying the HOME-ARP Grant Specialist (contact information is available on [DEHCR's website](#)). The subject of the email should follow the below format:

HOME-ARP 23-XX, Grantee Name, Quarter or Month/Year of Payment

Quarterly Financial Updates and Quarterly Reporting should be sent to the HOME-ARP Grant Specialist (contact information is available on [DEHCR's website](#)).

Grantees must submit final Payment Requests and Reporting within sixty (60) days of the performance period end date of their grant agreement or termination thereof, whichever comes earlier. Payment Requests submitted after sixty (60) days of the performance period end date of their grant agreement or termination thereof will not be processed.

## Chapter 7: Reporting

Grantees are required to submit quarterly reports to DEHCR which must be received on or before the fifteenth (15th) of the month following the close of the quarter. DEHCR reserves the right not to process payment requests until the quarterly reports have been submitted. Grantees are also required to submit a Grant Year-End Report within sixty (60) days of the performance period end date of their grant agreement or termination thereof, whichever comes earlier.

Most Quarterly Reporting and Grant Year-End Reporting can be pulled from HMIS, if used. Instructions for how to enter participant data into HMIS can be found on the Institute for Community Alliances (ICA)'s [HOME-ARP Data Entry webpage](#). Information for how to pull Quarterly Reporting and Grant Year-End Reporting from HMIS will be found on [ICA's HOME-ARP Quarterly Reporting webpage](#).

For Grantees using a HMIS comparable database, reporting must be provided via the reporting template which will be provided by the database once the grant agreement is executed.

Reporting is required for the entire performance period. This requirement is not dependent on when the Grantee requests funds. DEHCR reserves the right to require additional information or reports as needed. All reporting should be sent to the HOME-ARP Grant Specialist (contact information is available on [DEHCR's website](#)).

Below are the current required datapoints for each report:

### 1. Quarterly Reporting

Grantees must submit Quarterly Reports on the following services provided:

1. The number of homeless and not homeless households assisted by the following data points:
  - a. By McKinney Vento Supportive Services/Homelessness Prevention Services or Housing Counseling Services. Please indicate which services are being provided under these categories to this household.
    - (1) Race and ethnicity of household;
    - (2) Household Size; and
    - (3) Household type (Qualifying Population)
2. Households exiting the HOME-ARP Supportive Services program and reason for exit. If exit is due to a change in housing status or location, please include that.

## Chapter 8: Annual Monitoring

DEHCR will monitor the performance and requirements compliance of each Grantee at least annually. During the monitoring process, grantees should expect DEHCR to request all the documentation as outlined in [Chapter 3: Program Requirements](#), [Chapter 4: Administrative Requirements](#), and in [Chapter 5: Financial Management](#) of this Program Manual. The monitoring may be conducted either onsite or via desk monitoring. DEHCR reserves the right to change these monitoring requirements.

If the Grantee has sub-recipients, it is expected the Grantee will monitor the sub-recipients in the same way DEHCR will monitor the Grantee.

## Chapter 9: Resources

### 1. Questions

Any questions regarding the application process or the administration of this program can be directed to the HOME-ARP Grant Specialist (contact information is available on [DEHCR's website](#)) or [DOASupportiveHousing@wisconsin.gov](mailto:DOASupportiveHousing@wisconsin.gov). More information, including training materials, can also be found on DEHCR's website at: [DEHCR HOME-ARP Supportive Services \(wi.gov\)](#).

### 2. Statutes

Additional information on the HOME-ARP Supportive Services program can be found at: [HUD Exchange](#) and in the [HOME-ARP Implementation Notice](#).