

Recovery Voucher Grant Program

Helping people diagnosed with or receiving treatment for opioid use disorder find safe interim housing for themselves and their families.

Program Manual

Grant Year 2024

State of Wisconsin

Department of Administration

Division of Energy, Housing and Community Resources

Provides program rules and guidance for the Recovery Voucher Grant Program

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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 in partnership with the Department of Health Services (DHS) as a resource for the Recovery Voucher Grant (RV) program. RV grantees are required to follow all state and federal requirements, and all policies and procedures in this guide.

2) Program Overview

Safe and stable housing is fundamental to helping people in recovery have more successful long-term outcomes and enables providers to serve them most effectively. Recognizing this, DHS is using a portion of Wisconsin's McKinsey & Company opioid settlement to fund the RV program. The goal of the RV program is to provide an opportunity for people who have been diagnosed with opioid use disorder (OUD) or are receiving treatment for OUD to move into safe interim housing who otherwise would struggle to find housing due to limited housing options, financial or other barriers. DEHCR administers the program on behalf of DHS.

Recipients of this grant will become RV Administrators for their Continuum of Care (CoC)/Local Homeless Coalition (LHC) service territory. As RV Administrators they will receive client referrals from their CoC/LHC partners, enter clients into the program, and work with recovery residences to house them including paying monthly dues² to the recovery residences. Please note, recovery residences and agencies that have a recovery residence cannot apply due to the inherent conflict of interest created by being both the RV Administrator (providing funding to recovery residences) and the recovery residence (receiving funding from the RV Administrator). Exceptions to this will be made on a case-by-case basis. If your agency is interested in an exception, please contact the RV Grant Specialist.³

Each year several grants of up to \$125,000 each will be awarded based on a combination of the applicant's merit (determined by their application's score), the applicant's location, and availability of funds. Applicants are encouraged to apply for the full award amount. Funds can be used to provide housing in DHS recognized recovery residences, limited client transportation, case management, and to cover administrative costs. Applicants can request up to 20% of the total award in case management funds and up to 10% of the total award in administrative funds, however they can also request less or none. Transportation costs are limited to 1% of the total award. The exact allocation between fund types will be specified in each grantee's contract.

¹ The service territory is defined as the boundaries of the CoC for the 3 county based CoC's, and as the boundaries of the LHC for the Balance of State CoC.

² Monthly dues are referenced instead of monthly rent since the majority of recovery residences do not have lease agreements with their clients and instead have participation agreements.

³ Contact information can be found on the <u>DEHCR Recovery Voucher Grant Program website</u>.

⁴ Recovery residences must be on the <u>DHS Recovery Residence Registry</u> to receive funds from this grant.

3) Eligible Applicants

Eligible applicants are limited to agencies that have ALL of the following qualifications:

- Applicant agrees to be an RV Administrator for their CoC/LHC service territory. This includes but isn't limited to accepting client referrals, entering clients into the RV program, and working with recovery residences to house clients.
- 2) Applicant is a member of their HUD-recognized CoC/LHC.
- 3) Applicant has current direct experience delivering services to people experiencing homelessness.
- 4) Applicant has an active HMIS subscription.
- 5) Applicant is registered with SAM.gov and can show proof of non-debarment/no active exclusions.
- 6) There is a DHS recognized recovery residence⁵ within the applicant's service territory.
- **Please note, recovery residences and agencies that have a recovery residence cannot apply due to the inherent conflict of interest, however exceptions will be made on a case-by-case basis. If your agency is interested in an exception, please contact the RV Grant Specialist.⁶

Recovery Residence Definition: Per DHS 'recovery residences are defined as home-like, residential environments that promote health recovery from a substance use disorder and support people recovering from a substance use disorder through use of peer recovery support.' For more information on recovery residences please see the DHS Recovery Residence Registry Requirements & Application. Questions on DHS's Recovery Residence Registry and how to apply to be on the registry, can be directed to the DHS Division of Quality Assurance (DQA), Behavioral Health Certification Section by emailing DHSDQAMentalHealthAODA@dhs.wisconsin.gov. Please note the RV grant does not provide assistance to recovery residences to open or provide operating costs. Please see the DHS Recovery Residence Registry for the most updated list of DHS recognized recovery residences.

Chapter 2: Application Process & Grant Timeline

1) Overview

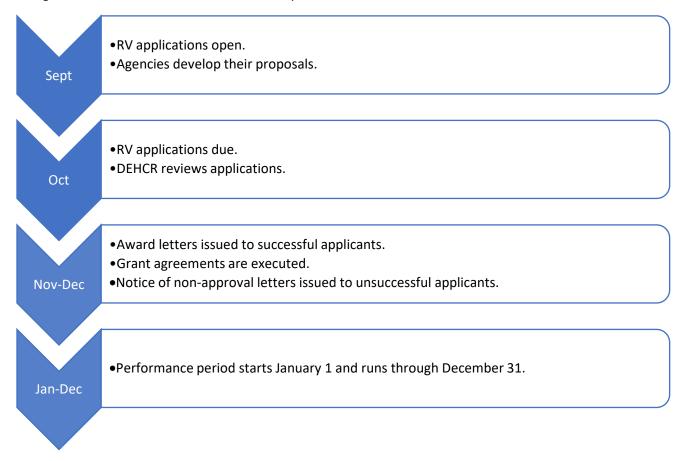
DEHCR will post an application on their website (<u>DEHCR Recovery Voucher Grant Program</u>) inviting all interested applicants who meet the eligibility requirements to submit. Applicants will be given a set amount of time to develop their applications. After the submission deadline, a review team at DEHCR will score each application. The applications will be ranked, and the top scoring applications based on the scoring criteria will receive awards. DEHCR reserves the right to alter this process.

⁵ The <u>DHS Recovery Residence Registry Directory</u> lists all recovery residences on the registry.

⁶ Contact information can be found on the <u>DEHCR Recovery Voucher Grant Program website.</u>

2) General Timeline

The general timeline for the annual RV 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 program. Grant agreements will be executed upon signature of both parties.

Chapter 3: Program Requirements

1) Client Eligibility

Individuals who are 18 or older (singles), and individuals who are 18 or older with family members who will stay with them (families) are eligible to be supported by the RV program if the individual (single client) or an adult member of the family meets **both** the following criteria:

1. Documentation of OUD diagnosis or of receiving treatment to address OUD within the previous 12 months.

Eligibility documentation can be provided through one of the following options:

- 1) Signed note from a health or behavioral health provider; or
- 2) Record from a health or behavioral health provider; or
- 3) Claims statement that details OUD care/treatment was received; or
- 4) Notes from a phone call with release of information from a health or behavioral health provider signed by the agency member who made the call (requires signed consent from the potential client if the potential client is not on the phone call).

Note, if OUD diagnosis documentation is being used for eligibility, the OUD diagnosis does <u>not</u> have to be recent, nor does it have to be the primary diagnosis. For example, a potential client could have an OUD diagnosis from 5 years ago and have other diagnoses too.

If using documentation of OUD treatment for eligibility, OUD treatment must have been received within the previous 12 months. OUD does not have to be the primary reason a potential client is in/received treatment; however, it does have to be one of the reasons a potential client is in/received treatment.

OUD eligibility documentation must be received before a potential client can be entered into the RV program. This documentation should be kept in the client's file. When DEHCR monitors for compliance, DEHCR will want to know when (the date) and how (what type of documentation was used) OUD eligibility was confirmed but will not want to see the OUD eligibility documentation itself.

2. Documentation of Homelessness (Categories 1, 2, 3, or 4)

In order to be eligible, clients must also meet the HUD definitions for category 1, 2, 3, or 4 homelessness⁷ on the day they enter the RV 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; 	 Written observation by the outreach worker; or Written referral by another housing or service provider; or

⁷ As defined by 42 U.S. Code § 11302 part a) 1-5 and part (b) (Link: <u>42 USC Ch. 119: HOMELESS ASSISTANCE</u> (house.gov)).

	(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	 Certification by the individual seeking assistance stating that (s)he was living on the streets or in shelter; For Individuals exiting an institution – one of the forms of evidence above and: Discharge paperwork or written/oral referral, or Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited an institution
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; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing	 A court order resulting from an eviction action notifying the individual or family that they must leave; or For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or A documented and verified oral statement; and Certification that no subsequent residence has been identified; and Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing
Category 3: Homeless under other Federal Statutes	(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: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing (PH) during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers	 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; and Certification of no PH in last 60 days; and 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; and Documentation of special needs or 2 or more barriers
Category 4:	(4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence;	 For victim service providers: An oral statement by the individual or head of household seeking assistance

Fleeing/Attempting to Flee Domestic Violence	(ii) Has no other residence; and(iii) Lacks the resources or support networks to obtain other permanent housing	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.
		 For non-victim service providers: Oral statement by the individual 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; and Certification by the individual that no subsequent residence has been identified; and Self-certification, or other written documentation, that the individual lacks the financial resources and support networks to obtain other permanent housing.

Source and link to downloadable PDF: <u>At a Glance_Criteria and Recordkeeping Requirements by</u> Definition of Homelessness.

The client's entry date into the RV program is the date the client meets both the OUD eligibility requirement, and the homeless requirement, AND has documentation of such.

A client must be entered into the RV program before their stay at a recovery residence can be supported by the RV program. The day the client enters the recovery residence, as defined by the RV program, is the day the client's stay at the recovery residence begins to be supported by the RV program.

A client's entry into the RV program, and entry into a recovery residence can occur on the same day so long as the necessary documentation has been completed. More information can be found in the Recovery Residence Dues section.

2) Unallowable Client Eligibility Requirements

RV Administrators cannot require individuals or individuals and their families to be residents of the state or locality to receive services. Potential clients can access the RV program through any RV Administrators. RV Administrators can place clients in recovery residences anywhere in the State of Wisconsin, however RV Administrators are not required to place clients in recovery residences outside of their service territories.

3) Client Applications & Pre-Screening

Every client who enters the shelter or is referred to an RV Administrator must be asked if they meet the eligibility requirements for the RV program. If they do, they should be asked if they are interested in the

RV program and given an application to fill out. Client applications must be submitted in writing (either in-person or electronically; electronic signatures through services such as DocuSign are accepted) and must include all information required by the RV Administrator to determine the client's eligibility. RV Administrators may develop application forms that meet their specific needs.

RV Administrators 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, the applicant must then complete the full application based on their current situation. The applicant must be eligible for the RV program at the time they are entered into the RV program (being eligible when they were added to the waiting list is not sufficient).

4) Waiting List Policy

The demand for assistance may be greater than available resources. RV Administrators may choose to use a waiting list. If a waiting list is used, the RV Administrator must establish a written Waiting List Policy which defines how the waiting list is managed. The following is a non-exhaustive list of parameters RV Administrators 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 the list until all eligible applicants receive assistance; continuously accepting applications; etc.).

5) Client Denial

Clients who fill out a RV program application and then are determined to be ineligible based on the information provided, 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.

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

6) Overview of Eligible Activities & Reimbursable Costs

The RV program is divided into three (3) main types of funds: client assistance, case management, and administrative.

1. Client Assistance

Applicants can request 70%-100% of the total award be in client assistance funds. The percentage allocation between client assistance funds, case management funds and administrative funds will be specified in the RV Administrator's contract.

1) Recovery Residence Dues

a) Rates and Payment Terms

Client assistance funds can be used to cover the bed cost of a client and their family (if applicable) staying in a DHS recognized recovery residence. Bed cost (or bed rate) is defined as the cost for an individual (and their family if applicable) to stay (have a bed) at a recovery residence. The bed cost does not include any ancillary services such as, but not limited to case management provided by the recovery residence, healthcare costs (including support groups), meals, and peer support activities. Consistent with other supportive housing programs, the RV program can cover monthly bed cost and a security deposit (if applicable; the security deposit maximum may be twice the monthly bed cost). If a security deposit is required, the security deposit must be returned to the client at the end of their stay minus any applicable charges for damages. If applicable, a list of damages will be provided to the RV Administrator. If the security deposit cannot be returned to the client after 30 days (example: when there is no way to contact the client), the security deposit shall be returned to the RV Administrator.

Payments are to be provided monthly and cannot be made more than a month in advance (paying multiple months at once is not allowed).

If the client has moved into a recovery residence and then is a "no-show", their bed may be held a maximum of 30 days if the recovery residence chooses to do so. The goal of this is to provide time to locate the client and have the client return to the recovery residence. During this time, the RV program will continue to pay for the client's bed.

If the client is moving into the recovery residence on a day other than the first of the month, the rate for the first month must be prorated to reflect the number of days the client is staying during the first month.

If the end of the client's stay at the recovery residence or the end of the client's bed being held is within the first 15 days of the month (or of the billing period), the recovery residence must return half the amount of that month's (or billing period's) dues. The RV program will only cover half the monthly (or billing period's) cost if the end of the client's term is within the first 15 days of the month (or billing period).

The bed rates charged to the RV program by the recovery residences must be both:

- The same or less than the bed rates charged for non-assisted beds (beds not supported by the RV program). The RV program must get the best rates offered by each recovery residence.
- 2) The same or less than the RV Maximum Allowable Rate (RV Max Rate). There is a RV Max Rate for singles and a RV Max Rate for families.

Clients are not allowed to pay the difference between what the RV program will cover and what the recovery residence charges for a bed, nor can clients pay a portion of the bed rate even if the bed rate adheres to the above rules (for example, paying an increasing percentage of the cost over the course of their stay).

b) RV Maximum Allowable Rate and Room Guidelines for Singles

The RV Max Rate for singles is 135% of the Fair Market Rate (FMR) for a Single-Room Occupancy (SRO) unit within the area where the recovery residence is located. The FMR is defined each Fiscal Year by the Department of Housing and Urban Development (HUD) Office of Policy Development and Research. FMR information including rates can be found here: Fair Market Rents (40th PERCENTILE RENTS) | HUD USER. The SRO unit rate is calculated as 75% of the FMR of an efficiency unit. To calculate the RV Max Rate for singles, follow the below formula:

Efficiency FMR * 75% * 135% = RV Maximum Allowable Rate for Singles

Exceptions to the RV Max Rate for singles can be made by DEHCR on a case-by-case basis. Please contact the RV Grant Specialist⁸ if an exception is being sought for a particular client.

Standard rooms for singles have two (2) beds per room. Rooms with more or less beds than the standard (2) per room can be reviewed and approved by the RV Administrator on a case-by-case basis, however the RV Max Rate will not change. For example, if an RV Administrator approves a room with only one (1) bed for a client, the RV Max Rate would still be calculated as Efficiency FMR * 75% * 135%.

c) RV Maximum Allowable Rate and Room Guidelines for Families

The RV Max Rate for families is 135% of the Fair Market Rate (FMR) for an Efficiency unit within the area where the recovery residence is located. To calculate the RV Max Rate for families, follow the below formula:

Efficiency FMR * 135% = RV Maximum Allowable Rate for Families

FMR information including rates can be found here: <u>Fair Market Rents (40th PERCENTILE RENTS)</u> <u>HUD USER.</u> Exceptions to the RV Max Rate for families can be made by DEHCR on a case-by-case basis. Please contact the RV Grant Specialist⁹ if an exception is being sought for a particular family.

Families can be housed in units ranging from a shared room to a single-family house. Given this range, RV Administrators are required to provide rationale for why they believe the unit selected will best meet the family's needs compared to other available alternatives when the family is placed.

d) Time Limits

The RV program allows clients to be supported through the end of the performance period up to a maximum of 24 months as funding allows. RV Administrators can set their own tenure policy within this time constraint based on the needs of their service territory. If they decide to create their own policy, a written tenure policy that applies to all clients is required. Further, RV Administrators may decide to extend a client's time beyond their tenure policy but still within

⁸ Contact information can be found on the DEHCR Recovery Voucher Grant Program website.

⁹ Contact information can be found on the DEHCR Recovery Voucher Grant Program website.

the time constraint of the grant contract based on the client's individual needs. If a client's stay is extended the RV Administrator will need to fill out the <u>Client Stay Extension Form</u> with the rationale for extending the client's stay and keep this form in the client's file.

e) Changing Recovery Residences & RV Program Re-Entry

Once a client is in the RV program, if they need to move to another recovery residence, they can continue to be supported by the RV program. Ideally, there should be no gap between one (1) recovery residence stay and another.

If after exiting the RV program, the client realizes within 30 days or less (their "time away" has been 30 days or less) they would be better served by staying in the RV program, and the RV Administrator has both the capacity and budget to allow the client to re-enter the RV program, the client can do so without the need to recheck eligibility.

Please note, to take advantage of the ability not to recheck eligibility described above, the amount of "no-show" time and "time away" time cannot exceed 30 days combined.

If it has been more than 30 days since the client left the RV program and the client is interested in re-entering the program, the client's eligibility must be rechecked based on their current status.

A client can only be supported in one (1) recovery residence at a time. There can be no overlap between recovery residence stays.

f) Service Animals

If a client has a service animal that is required because of a disability and the animal has been trained to perform work or a necessary task for the client, the RV program can pay for a service animal security deposit, and a service animal monthly fee on a case-by-case basis. Please contact the RV Grant Specialist¹⁰ for additional information. Information on service animals can be found at <u>ADA.gov Service Animals</u>.

2) Transportation

Eligible transportation costs are restricted to bringing the client (and their family, if their family will be staying with them at the recovery residence) to the recovery residence at the start of the program and then providing a return trip at the end of the client's tenure (or family's tenure) at the recovery residence. These funds will not cover moving costs, or transportation during the client's stay. Up to 1% of the RV Administrator's total award can be spent on transportation (example: If the RV Administrator's award is \$125,000, the maximum amount the RV Administrator could spend on transportation would be \$1,250). Transportation will be billed as part of client assistance along with recovery residence dues.

¹⁰ Contact information can be found on the <u>DEHCR Recovery Voucher Grant Program website</u>.

2. Case Management

Case management funds can be used for case managers, and associated case management services needed to place clients (and their families if applicable) in recovery residences, keep them safely housed in recovery residences, and help them find housing or another appropriate situation when their recovery residence stay is ending. Reimbursable costs can include case manager salaries, benefits, and training (if specific to case management or the RV program population).

Timesheets must reflect the hours spent by funding source. Costs for staff to be on call to provide services are not eligible for reimbursement.

Supervisory costs cannot be billed under case management funds however they can be billed under administrative funds.

Case management funds can also be used for costs directly tied to a case manager such as office space, computer costs, and mileage. Please note, capital expenditures are not allowable costs. RV program managers should work with their accounting department to determine what can be charged following standard accounting practices. Note, if a case manager's time is split across the RV program and other activities an allocation plan is required for any directly associated resources billed to the RV program. The allocation plan should detail how only the portion of the directly associated resources used for the RV program was billed to the RV program.

Applicants can request up to 20% of the total award be case management funds but can also request less or none. The percentage allocation between client assistance funds, case management funds and administrative funds will be specified in the RV Administrator's contract.

3. Administrative Funds

These funds can pay for 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. Please note these costs will need to be prorated to reflect the percentage of the staff person's time or the percentage of the resource that is dedicated to the RV program. Further, capital expenditures are not allowable costs. RV program managers should work with their accounting department to determine what can be charged following standard accounting practices.

Applicants can request up to 10% of their award be administrative funds but can also request less or none. The percentage allocation between client assistance funds, case management funds and administrative funds will be specified in the RV Administrator's contract.

7) Non-Reimbursable Costs

RV program funds may not be spent on the following:

- a. The costs covering the last half of the month (or billing period) of a recovery residence stay if the client's term ended within the first 15 days of the month (or billing period).
- b. Ancillary costs at recovery residences (beyond the cost of the bed/accommodation) including, but not limited to, case management at the recovery residence, support groups, transportation during the client's stay, meals, activity fees, and gym memberships.
- c. Late fees.
- d. Arrears, back dues/back rent/past due security deposits.
- e. Moving costs.
- f. Transportation other than initial transportation to a recovery residence at the beginning of a client's stay and/or return from a recovery residence at the end of the client's stay.
- g. Expenses incurred outside of the performance period.
- h. Capital expenditures.
- i. Alcoholic beverages.
- j. 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

RV Administrators must commit to providing the services mutually agreed upon in their contracts. RV Administrators must provide all services directly, as well as maintain primary responsibility for all contractual issues, and administrative duties.

Contracting with a recovery residence to provide interim housing does not trigger the need for a subcontracting agreement.

2) Contract Amendments

RV Administrators may amend their contracts only with written approval from DEHCR. To request a contract amendment, RV Administrators are encouraged to consult with the RV Grant Specialist, then electronically submit:

- 1) A written request defining and justifying the changes being requested. The request must be signed by someone with contract signature authority (digital signatures are accepted).
- 2) An amended budget if any changes are requested (Excel files preferred).

<u>DEHCR must receive all contract amendment requests no later than thirty (30) days before the end of the contract period.</u>

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, RV Administrators are required to use the HMIS database to track client participation and data. They are required to have a specific program for the RV program and to keep HMIS up to date. They 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) Coordinated Entry

Each HUD COC is required to develop and operate a coordinated entry system. Coordinated entry refers to a process for people to access homelessness prevention, housing, and related services within a given COC. It includes the following core components:

- 1) Information so people will know where or how to access coordinated entry.
- 2) A place or way to request assistance, such as a walk-in center or a 2-1-1 call center.
- 3) A screening and assessment process and tools to gather information about the person, their housing and service needs, and program eligibility and priority.
- 4) Information about programs and agencies which provide housing or services.
- 5) A process and tools for referral to appropriate programs or agencies.

RV Administrators may use any applicable coordinated entry procedures or any other procedure to evaluate client eligibility for the RV program.

5) Recovery Residence Stay Agreements

For each client (and their family, if applicable; in this section the client and their family will also be referred to as the client for brevity) placed in a recovery residence the RV Administrator must sign an agreement with the recovery residence where the client will be staying. A template is available on DEHCR's Recovery Voucher Grant website. This agreement must include the following elements:

- 1) Statement that the recovery residence is on the DHS Recovery Residence Registry on the day the stay agreement is signed.
- 2) Outline of the costs including, but not limited to, the pro-rated first month (if applicable), monthly rate, and security deposit (if applicable) and payment terms. The security deposit is to be returned to the client minus any applicable charges for damages at the end of the client's stay. If applicable, a list of damages will be provided to the RV Administrator. The client must have moved into the recovery residence in order to receive this benefit. If the security deposit cannot be returned to the client after 30 days, it shall be returned to the grantee.
- 3) Statement that the rate charged is the bed rate and does not cover any ancillary services such as case management, transportation (during the client's stay), health/mental health care, and support groups.
- 4) Statement that the rate charged is the same or less than the bed rate charged for beds not in the RV program.

- 5) Acknowledgement that a bed may be held for a client who has moved into the recovery residence and then is a "no-show" for a maximum of 30 days if the recovery residence chooses to do so. During this 30-day window the RV program will continue to pay for the client's bed.
- 6) Statement that if a client's term ends within the first 15 days of the month (or the billing period), the recovery residence is to return half the amount of that month's (or billing period's) dues.
- 7) A requirement that the recovery residence inform the grantee if there are any issues with a client that is potentially being asked to leave a recovery residence in order for the grantee to provide assistance to prevent such an outcome. If a client is asked to leave a recovery residence, the recovery residence will immediately inform the grantee (within 48 hours) and preferably before eviction/termination whenever possible.
- 8) A requirement that each client (18 and over) be required by the recovery residence to sign a form attesting to the fact they have received the policies and procedures of the recovery residence including their termination policy. The recovery residence must share this signed form and a copy of their policies and procedures with the grantee.
- 9) A requirement that the recovery residence perform an exit interview with each client (if the situation allows), and share the applicable data, including where the client is exiting to if known, with the grantee.
- 10) A statement encouraging the recovery residence to follow best practices and to attempt to exercise available avenues and options before evicting a client if a client relapses.

6) Required Client File Elements

Each client file will be split into two parts, an electronic file kept in HMIS and a file for documents that will be kept outside of HMIS.

1. Non-HMIS Client File Elements

Each client will have a file for documents and records that will be kept outside of HMIS. The following is a list of the critical elements:

- 1) Documentation of eligibility.
 - 1. Documentation of OUD diagnosis or of receiving treatment to address OUD within the previous 12 months.
 - 2. Documentation of HUD category 1, 2, 3, or 4 homelessness.

More information on documentation of eligibility can be found in the <u>Client Eligibility</u> section.

- 2) Recovery Residence Program Compliance Documentation (a form is available on <u>DEHCR's</u> Recovery Voucher Grant website) showing the following:
- 3) Signed documentation the recovery residence's monthly bed rate is at or below the RV Max Rate (for singles or families depending on if the individual's family will be staying with them or not) for the area where the recovery residence is located (see the Recovery Residence
 Dues section for more information), or if an exception to the RV Max Rate was made, a copy of DEHCR's exception approval.
- 4) Signed documentation the rate charged to the RV program by the recovery residence is the bed-rate, and no ancillary charges for services such as but not limited to support groups, transportation, health/mental health care, etc. were included.

- 5) If the client is an individual (single), signed documentation the room at the recovery residence adheres to the norm of 2 beds per room, and if doesn't signed rationale for why the RV Administrator granted an exception. If the client is an individual with a family (family), signed rationale from the RV Administrator describing why the unit best met the family's needs compared to available alternatives at the time of placement.
- 6) Signed documentation stating the recovery residence is within the RV Administrator's service territory or providing rationale why an out of service territory recovery residence was used.
- 7) Signed documentation the recovery residence was on the DHS Recovery Residence Registry at the time of the client's (and their family's, if applicable) placement.
- 8) Recovery Residence Stay Agreement signed by the RV Administrator and the recovery residence (see <u>Recovery Residence Stay Agreement</u> section for more information). A Recovery Residence Stay Agreement template is available on <u>DEHCR's Recovery Voucher Grant website</u>.
- 9) Documentation of the amount and type of financial assistance provided to the client (and their family, if applicable), along with documentation of payments made (example: invoices, ledger describing the service paid for, time period, check number and amount paid).
- 10) Signed certification by the client (and other family members who are 18 and above, if applicable) they received the RV Administrator's RV program termination policy. A template of the certification form can be found on <u>DEHCR's Recovery Voucher Grant website</u>. If applicable, correspondence between the RV Administrator and the client (and their family, if applicable) if the client was terminated.
- 11) Signed documentation of rationale for extending the client's (and their family's, if applicable) stay at a recovery residence beyond the RV Administrator's tenure policy (if applicable; RV Administrators cannot extend tenure beyond 24 months or the end of the performance period whichever is shorter). A template of the form can be found on DEHCR's Recovery Voucher Grant website.
- 12) Signed certification by the client (and other family members who are 18 and above, if applicable) they received the policies and procedures of the recovery residence including the recovery residence's termination policy. If applicable, correspondence between the recovery residence, RV Administrator, and the client (and their family, if applicable) if the client was terminated. A template of the certification form can be found on DEHCR's Recovery Voucher Grant website.

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. Further, when DEHCR monitors for compliance, DEHCR will want to know when, the date, OUD eligibility was confirmed but will not want to see the OUD eligibility documentation.

2. HMIS Client File Elements

Information collected for singles compared to families will slightly be different. The following outlines the needed elements for singles and then families.

1) HMIS Client File Elements for Singles

An electronic file must be created in HMIS for each client without accompanying family members (singles) containing the following elements:

- 1) Initial Assessment
 - 1. Income and sources.
 - 2. Sociodemographic Information including but not limited to:
 - 1. Previous living situation.
 - 2. Age.
 - 3. Disability status (yes/no).
 - 4. Disability information (types).
 - 5. Ethnicity.
 - 6. Gender.
 - 7. Race.
- 2) Participation in the RV Program
 - 1. Eligible homelessness category.
 - 2. RV program entry and exit dates (not dependent on whether the client is in a recovery residence).
 - 3. Specific recovery residence stay information.
 - Recovery residence entry date (if the client is already staying in the recovery residence, this is the day their stay begins to be supported by the RV program), and recovery residence exit date (if the client stays at the recovery residence beyond the time their stay is supported by the RV program, this is the date their stay stops being supported by the RV program).
 - 2. County of recovery residence.
 - 3. Address of the recovery residence (optional not for reporting).
 - 4. Reasons for exiting the RV program.
 - 5. Income and sources at exit.
 - 6. Substance use question (at exit): During your time in the program have you used any substances, other than those prescribed to you, as listed below?

Answers: Yes, No

If yes, follow up question: What substances have you used?

Answers (pick as many as apply):

- 1. Alcohol.
- 2. Cocaine.
- 3. Heroin.
- 4. Marijuana.
- 5. Methamphetamine.
- 6. Prescription opioids not prescribed to you.
- 7. Refused.
- 8. Unsure/Don't Know.

7. Exit destination.

3) Reassessment Information

To be completed every 12 months, from when the client was accepted into the RV program (not from when the client was first housed in a recovery residence), including:

1. Substance use question: In the past 12 months have you used any substances, other than those prescribed to you, as listed below?

Answers: Yes, No

If yes, follow up question: What substances have you used?

Answers (pick as many as apply):

- 1. Alcohol.
- 2. Cocaine.
- 3. Heroin.
- 4. Marijuana.
- 5. Methamphetamine.
- 6. Prescription opioids not prescribed to you.
- 7. Refused.
- 8. Unsure/Don't Know.
- 2. Income and sources.

2) HMIS Client File Elements for Families

An electronic file must be created in HMIS for each member of the family. These files will be grouped together into a household. Each member of the family will have slightly different information requirements. The family is broken down into:

- 1) Main Client (the person with OUD diagnosis eligibility)
- 2) Other Adults (individuals who are 18 years old and above)
- 3) Children (individuals who are 17 years old or younger)

Below outlines which elements pertain to which family members. These are the same data elements as singles, however not all data elements are applicable to all family members.

- 1) Initial Assessment
 - 1. Income and sources. (Main Client, Other Adults)
 - 2. Sociodemographic Information including but not limited to: (All Family Members)
 - 1. Previous living situation.
 - 2. Age.
 - 3. Disability status (yes/no).
 - 4. Disability information (types).
 - 5. Ethnicity.
 - 6. Gender.
 - 7. Race.

- 2) Participation in the RV Program
 - Eligible homelessness category. (Main Client; other family members will automatically have this data entered in their profile by being tied to the main client.)
 - 2. RV program entry and exit dates (not dependent on whether the client is in a recovery residence). (Main Client; other family members will automatically have this data entered in their profile by being tied to the main client.)
 - 3. Specific recovery residence stay information. (Main Client; other family members will automatically have this data entered in their profile by being tied to the main client.)
 - 1. Recovery residence entry date (if the family is already staying in the recovery residence, this is the day their stay begins to be supported by the RV program), and recovery residence exit date (if the family stays at the recovery residence beyond the time their stay is supported by the RV program, this is the date their stay stops being supported by the RV program).
 - 2. County of recovery residence.
 - 3. Address of the recovery residence (optional not for reporting).
 - 4. Reasons for exiting the RV program. (Main Client; other family members will automatically have this data entered in their profile by being tied to the main client)
 - 5. Income and sources at exit. (Main Client, Other Adults)
 - 6. Substance use question (at exit): During your time in the program have you used any substances, other than those prescribed to you, as listed below? (Main Client) Answers: Yes, No

If yes, follow up question: What substances have you used? Answers (pick as many as apply):

- 1. Alcohol.
- 2. Cocaine.
- 3. Heroin.
- 4. Marijuana.
- 5. Methamphetamine.
- 6. Prescription opioids not prescribed to you.
- 7. Refused.
- 8. Unsure/Don't Know.
- 7. Exit destination. (Main Client; other family members will automatically have this data entered in their profile by being tied to the main client.)

3) Reassessment Information

To be completed every 12 months, from when the main client was accepted into the program (not from when the main client was first housed in a recovery residence), including:

1. Substance Use Question: In the past 12 months have you used any substances, other than those prescribed to you, as listed below? (Main Client)

Answers: Yes, No

If yes, follow up question: What substances have you used? Answers (pick as many as apply):

- 1. Alcohol.
- 2. Cocaine.
- 3. Heroin.
- 4. Marijuana.
- 5. Methamphetamine.
- 6. Prescription opioids not prescribed to you.
- 7. Refused.
- 8. Unsure/Don't Know.
- 2. Income and sources. (Main Client, Other Adults)

7) Client Flow, and Paperwork Timing

The following provides an overview from the time a client is accepted into the RV program to when a client exits the RV program and the associated paperwork that is required at each step of the process.

- 1) The RV Administrator gathers eligibility documentation from the client for OUD and for homelessness. See the <u>Client Eligibility</u> section for details. The client must qualify for both OUD eligibility and homelessness eligibility and have documentation of such on the day they enter the RV program. For example, documentation that a client met category 1-4 homelessness eligibility <u>a month prior</u> would not be sufficient for RV program eligibility. Further, if a waiting list is used, when the potential client is pulled from the waiting list, their eligibility must be confirmed based on their current status before they are entered into the RV program.
- 2) If the client is eligible (and therefore their family is eligible too; in this section we will use client to refer to both single clients and family clients), the client will be entered into the RV program. The RV Administrator will enter the client into the RV program in HMIS. They will also give the client the RV program termination policy and ask the client (and other family members who are 18 and above, if applicable) to sign a receipt stating they received the RV program termination policy and had the opportunity to ask questions (a template is available on <u>DEHCR's Recovery Voucher Grant website</u>).

If the client is not eligible, the client will be issued a written notice including the opportunity to have their case reviewed within 10 days. See the <u>Client Denial</u> section for more information.

3) The RV Administrator will look for a recovery residence that has availability, best meets the client's needs, and is on the DHS Recovery Residence Registry. Once a spot is found, the RV Administrator will fill out the Recovery Residence Program Compliance Documentation (a template is available on DEHCR's Recovery Voucher Grant website). The RV Administrator will enter into a Recovery Residence Stay Agreement (a template is available on DEHCR's Recovery Voucher Grant website) with the recovery residence. Both the RV Administrator and the recovery residence must sign the Recovery Residence Stay Agreement before the client's stay can begin to be supported by the RV program.

- 4) The client will move into the recovery residence. The recovery residence will provide a copy of their policies and procedures, including their termination policy to the client and collect a signed receipt from the client (and other family members who are 18 and above, if applicable) stating they received the policies and procedures and had the opportunity to ask questions (a template is available on DEHCR's Recovery Voucher Grant website). The recovery residence will provide a copy of this signed receipt and a copy of their policies and procedures to the RV Administrator. The RV Administrator will update HMIS with the date the client entered the recovery residence, defined as the day the client's stay begins to be supported by the RV program, and information on the recovery residence. Sometimes a client may already be staying at a recovery residence, for the purposes of reporting, the RV program wants to know when the client's stay began and stopped being supported by the RV program, please record these dates in HMIS.
- 5) The RV Administrator will keep records of assistance (example: monthly invoices) provided on behalf of the client. Annually, from the time the client entered the RV program and upon exit from the RV program, the RV Administrator or the recovery residence will re-interview the client and the RV Administrator will update HMIS (see the HMIS (see the HMIS Client File Elements section for more information).
- 6) If the client is asked to leave the recovery residence, the recovery residence is required to notify the RV Administrator within 48 hours and preferably prior. The recovery residence will perform an exit interview with each client (if the situation allows) and share that information with the RV Administrator. The RV Administrator will update HMIS with the date the client left the recovery residence, and the other information provided in the client's exit interview. If the client exits within the first 15 days of the month (or billing period), the recovery residence must return half the monthly (billing period) dues to the RV Administrator. If a security deposit was paid, the security deposit will go back to the client minus any applicable charges for damages. If applicable, a list of damages will be provided to the RV Administrator. If the security deposit cannot go back to the client after 30 days, the security deposit shall be returned to the RV Administrator.

The RV Administrator will also decide whether the client should be terminated from the RV program or not. If the client is not terminated from the RV program, the RV Administrator will look for another recovery residence placement. If the client is terminated from the RV program, the RV Administrator will issue a written notice to the client with an opportunity to have the decision reviewed (see <u>Client Termination Policy for RV Program</u> for more information) and will exit the client from the RV program in HMIS. The RV Administrator will also perform an exit interview with the client (as the situation allows) and will work with the client as appropriate to find alternative housing.

<u>OR</u>

If the client is a "no show" after moving into the recovery residence, the recovery residence can hold the bed for the client for 30 days, and the RV program will continue to pay for it, while the

client is located. If the client doesn't return within the 30 days, the client will no longer be supported by the RV program. The RV Administrator will update HMIS with the date the client's stay at the recovery residence stopped being supported by the RV program, and their exit destination if known. The client will be exited from the RV program, and the RV Administrator will record this in HMIS too. This doesn't stop the RV Administrator from accepting the client back into the RV program, after re-confirming eligibility, at a later date.

OR

If the end of the client's stay is coming up, the RV Administrator will connect with the client as needed to help them find housing and perform an exit interview. Answers from the exit interview will be recorded in HMIS, plus the date the client's stay stopped being supported by the RV program, and the date the client exited the RV program. If the client is exiting because they have reached the maximum allowable time in the program set by the RV Administrator, the RV Administrator can decide to extend the time the client can be supported by the RV program through December 31, 2024, up to a maximum of 24-months whichever is shorter. In order to do this, the RV Administrator will need to fill out the Client Stay Extension Form (a template is available on DEHCR's Recovery Voucher Grant website) with the rationale for extending the client's stay.

If after exiting the RV program, the client realizes within 30 days or less (their "time away" has been 30 days or less) they would be better served by staying in the RV program, and the RV Administrator has both the capacity and budget to allow the client to re-enter the RV program, the client can do so without the need to recheck eligibility.

Please note, to take advantage of the ability not to recheck eligibility described above, the amount of "no-show" time and "time away" time cannot exceed 30 days combined.

If it has been more than 30 days since the client left the RV program and the client is interested in re-entering the program, the client's eligibility must be rechecked based on their current status.

8) 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

DEHCR will not entertain a request for a contract amendment or 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. RV funds may not be used to influence federal or state contracting, federal or state financial transactions, or federal or state cooperative agreements.

4. Client Choice

Grantees can provide and encourage clients to accept case management and supportive services; however, a client's acceptance of case management and supportive services cannot be a condition for entering the RV program or remaining in the RV program.¹¹ DEHCR reserves the right to make exceptions on a case-by-case basis.

5. Client Eligibility Process

The grantee must have a process in place to screen clients to ensure eligibility. Eligibility must be checked immediately prior to the client's entry into the RV program and clients must be eligible for the RV program at entry.

6. Client Residency Status Policy

The grantee shall not require homeless individuals or families to be residents of the State of Wisconsin or locality to receive support services under the RV program, nor shall the grantee set differing levels of service based on whether a homeless individual or family are residents of the State of Wisconsin or locality. Potential clients can access the RV program through any RV Administrators. RV Administrators can place clients in recovery residences anywhere in the State of Wisconsin, however RV Administrators are not required to place clients in recovery residences outside of their service territories.

7. Client Termination Policy for RV Program

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

- 1. Grantees must document the provision of the termination policy to the client (and other family members who are 18 and above, if applicable).
- 2. Grantees may terminate assistance if a client violates the rules of the RV program.
- 3. Grantees must establish and follow a formal process that recognizes individual rights.
- 4. Grantees may terminate assistance only in the most severe cases.
- 5. 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 termination decision reviewed, in which the client is given the opportunity to present

¹¹ Recovery residences may have their own guidelines that differ from the RV program's policy. Recovery residences are not required to follow the RV program's guidelines. The client must be given a copy of the recovery residence's policies and procedures, including information on required case management or services. The client must receive the recovery residence's policies and procedures before (preferably) or upon entry and must sign documentation they received it. This documentation must be kept in the client's file.

- 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.
- 6. Grantees may provide assistance to a client who has been terminated from the RV program at a later date.

This policy must be specific to the grantee's RV program and must be different from recovery residences' termination policies.

8. 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.

9. Confidential, Proprietary and Personally Identifiable Information Policy

The grantee must develop and implement written procedures to ensure:

- 1. All records containing "personally identifying information," as defined under Wis. Stats. § 19.62(5), of any person or family who applies for and/or receives assistance under the RV program will be kept secure and confidential.
- 2. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter assisted under the RV program will not be made public except with written authorization of the person responsible for the operation of the shelter.
- 3. The confidentiality of records pertaining to any person provided family violence prevention or treatment services assisted under the RV program, including protection against the release of the address or location of any family violence shelter except with the written authorization of the person responsible for the operation of that shelter.
- 4. 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 RV program is prohibited except with the informed, written consent of the eligible individual or the individual's legal guardian.
- 5. If there is a disclosure of confidential information outside of the above guidelines, the grantee must notify the contracting or granting agency (DEHCR) within five (5) business days.

10. Conflict of Interest Policy

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

Organizational Conflict of Interest:

The grantee must not condition RV assistance on a client's acceptance of housing or another good or service owned by the grantee, or a department or division of grantee or any subrecipients or subcontractors of grantee.

Individual Conflict of Interest:

No person who exercises responsibility on behalf of the grantee over RV funds or who is in a position to participate in a decision-making process or gain inside information as related thereto may:

1. Obtain a financial interest or benefit from an assisted activity.

- 2. Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity.
- 3. 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:

Any procurement by grantee utilizing RV funds must ensure that:

- 1. No employee, officer, or agent of the grantee shall participate in the selection, award, or administration of a contract supported by RV funds if their participation would create a real or apparent conflict of interest.
- 2. Grantee's employees, officers, and agents shall not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.
- 3. Penalties, sanctions, or other disciplinary actions be levied for violations of either of the above.

In the event of a violation of any of the above within this section, the grantee may be required to repay any RV funds disbursed for which there is an identified conflict of interest unless an exception is granted by DEHCR.

11. Contractual Responsibility

Grantees must provide all services directly, as well as maintain primary responsibility for, all contractual issues, and administrative duties, unless an exception has been approved by DEHCR. Contracting with a recovery residence to provide interim housing does not trigger the need for a subcontracting agreement nor run counter to this policy.

12. 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 DEHCR will be notified within ten (10) days after the grantee receiving notice that a covered employee (an employee supported with RV funds) has been convicted of a criminal drug violation in the workplace.

13. Equity Advancement & Culturally Responsive Practices

The 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.

14. Financial Management

All funding sources from the DEHCR must be tracked separately. Payroll expenses should include documentation from timesheet to paycheck. Timesheets should show hours spent on RV eligible activities (differentiating between case management and administrative) vs. other non-RV 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 RV program was billed to the RV grant. Any indirect costs billed to the RV grant should follow standard accounting practices. Capital expenditures cannot be billed to the RV grant. The grantee should establish policies and procedures for keeping backup documentation on expenditures so it can be produced upon request.

15. Financial Statements

The grantee is required to provide DEHCR, DHS, and the Wisconsin Legislative Audit Bureau (LAB) access to financial statements and expenditure records upon request.

16. Involuntary Family Separation

The grantee must have and implement an Involuntary Family Separation Policy including the following rules:

- 1. All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marriage status identifying as a family must be served as a family by any project which serves families. There can be no involuntary separation.
- 2. There can be no documentation requirement or need for "proof" of family, gender identification, and/or sexual orientation. Examples of prohibited inquiry and documentation include but are not limited to parentage, birth certificates, and marriage certificates.
- 3. Families with children under age 18 must not be denied services based on the age of any child under age 18. For example, a family could not be denied assistance because there is a 16-year-old in the family.

17. Monitoring

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

18. Non-Discrimination Policy for Clients & Employees

Pursuant to Wis. Stats. § 16.765(2), in connection with the performance of work under the RV program, grantee agrees not to discriminate against any employee or applicant for employment because of age, race, religion, color, handicap, sex, physical condition, developmental disability as defined in s. 51.01 (5), sexual orientation or national origin. This provision shall include, but not be limited to, the following: employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. Except with respect to sexual orientation, the grantee further agrees to take affirmative action to ensure equal employment opportunities. The grantee agrees to post in conspicuous places, available for employees and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of the nondiscrimination clause.

Each grantee must have a policy expressing discrimination against clients/potential clients and employees/potential employees based on based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, physical condition, disability, age (40 or older), genetic information (including family medical history), family composition, marital status, arrest conviction record, or military service record is illegal and will not be tolerated. The policy

should outline a way for clients/potential clients and employees/potential employees to report discrimination, and potential repercussions for those who engage in discrimination.

19. No Required Faith Based Activities or Religious Influence

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

- 1. 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.
- 2. 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.
- 3. 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 RV program.
 - a. If a grantee conducts these activities, the activities must be offered separately in time or location from the programs or services funded under the RV program, and participation must be voluntary for RV program participants.

20. Prohibition on Conversion Therapy

All agencies and programs are prohibited from using state funds for Conversion Therapy. Pursuant to 2021 Wisconsin Executive Order 122, use of state funds for conversion therapy is expressly disallowed. 'Conversion therapy' does not include: any practice or treatment that provides acceptance, support, or understanding to an individual, or any practice or treatment that facilitates an individual's coping, social support, or identity exploration and development, so long as such practices or treatments do not seek to change sexual orientation or gender identity; any practice or treatment that is neutral with regard to sexual orientation or gender identity and that seeks to prevent or address unlawful conduct or unsafe practices, or any practice or treatment that assists an individual seeking to undergo a gender transition or who is in the process of undergoing a gender transition.

21. Recordkeeping and Retention

Grantees must retain all RV program files, financial documents, and records (including client files) for a minimum of six (6) years after the performance period ends or until notified by DEHCR that the records may be disposed of, unless there is litigation, claims, negotiations, or other actions involving the records, which started before such notification had been received from DEHCR. In such cases, the records must be retained until completion of the action and resolution of all issues which arise from it or until receipt of a disposal notification from DEHCR, whichever is longer.

22. Recovery Residence Location

If a client cannot be served at a recovery residence within the boundaries of the grantee's service territory, defined as the boundaries of grantee's Continuum of Care (CoC) or Local Homeless Coalition (if they belong to the Balance of State CoC), or would be better served at a recovery residence outside of the grantee's service territory, the client may be served at a recovery residence outside of the grantee's service territory if the client agrees. The client's voucher may either be provided by the grantee, or the client can be referred to the agency that is providing recovery vouchers for the territory the recovery residence is in, if that agency agrees.

23. Recovery Residence Payment Terms

Payments for security deposits, pro-rated first-month's dues, second-month's dues (first full month's dues) can be paid together. After, payments are to be provided on a monthly basis and cannot be made more than a month in advance (example: paying multiple months at once is not allowed).

24. Recovery Residence Room Types

For singles (individuals), the RV program can cover the cost of a bed within a room in a DHS recognized recovery residence. Rooms typically have two (2) beds per room. Rooms with more or less beds than the standard two (2) per room can be reviewed and approved by the grantee on a case-by-case basis. If the grantee approves a room deviating from the standard two (2) beds per room, the grantee must document the rationale for doing so in the client's file.

Families (individuals with family members staying with them) can be housed in units ranging from a shared room to a single-family house depending on the client's needs (examples of factors: size of the family and ages of the family members). Given this range, the grantee is required to provide rationale for why they believe the unit selected will best meet the family's needs compared to other available alternatives when placing families. This rationale must be documented and kept in the client's file.

25. Recovery Residence Selection

The grantee must not favor some recovery residences over others. Selection of which recovery residence a client is placed in should be dependent on the following three (3) required criteria:

- 1. The recovery residence is listed on the DHS Recovery Residence Registry.
- 2. The recovery residence will follow all RV program guidelines.
- 3. The recovery residence will best meet the client's needs as defined by the grantee versus other available alternatives at the time of placement.

Grantees can place clients in a DHS recognized recovery residence anywhere in the State of Wisconsin, however they are not required to place clients in DHS recognized recovery residences outside of their service territory.

26. Recovery Residence Stay Agreements

For each client placed in a recovery residence, the grantee must sign an agreement with the recovery residence where the client will be staying. This agreement must include the following terms and conditions:

- 1. Statement that the recovery residence is on the DHS Recovery Residence Registry on the day the stay agreement is signed.
- 2. Outline of the costs including, but not limited to, the pro-rated first month (if applicable), monthly rate, and security deposit (if applicable) and payment terms. The security deposit is to be returned to the client minus any applicable charges for damages at the end of the client's stay. If applicable, a list of damages will be provided to the RV Administrator. The client must have moved into the recovery residence in order to receive this benefit. If the security deposit cannot be returned to the client after 30 days, it shall be returned to the grantee.

- 3. Statement that the rate charged is the bed rate and does not cover any ancillary services such as case management, transportation (during the client's stay), health/mental health care, and support groups.
- 4. Statement that the rate charged is the same or less than the bed rate charged for beds not in the RV program.
- 5. Acknowledgement that a bed may be held for a client who has moved into the recovery residence and then is a "no-show" for a maximum of 30 days if the recovery residence chooses to do so. During this 30-day window the RV program will continue to pay for the client's bed.
- 6. Statement that if a client's term ends within the first 15 days of the month (or the billing period), the recovery residence is to return half the amount of that month's (or billing period's) dues.
- 7. A requirement that the recovery residence inform the grantee if there are any issues with a client that is potentially being asked to leave a recovery residence in order for the grantee to provide assistance to prevent such an outcome. If a client is asked to leave a recovery residence, the recovery residence will immediately inform the grantee (within 48 hours) and preferably before eviction/termination whenever possible.
- 8. A requirement that each client be required by the recovery residence to sign a form attesting to the fact they have received the policies and procedures of the recovery residence including their termination policy. The recovery residence must share this signed form and a copy of their policies and procedures with the grantee.
- 9. A requirement that the recovery residence perform an exit interview with each client (if the situation allows), and share the applicable data, including where the client is exiting to if known, with the grantee.
- 10. A statement encouraging the recovery residence to follow best practices and to attempt to exercise available avenues and options before evicting a client if a client relapses.

27. Recovery Residence Stay Time Limits

Clients can be supported by the RV program in a recovery residence for 24 months or through the end of the performance period whichever is shorter, as funding allows. Grantees can set their own tenure policy within the RV program's time constraints based on the needs of their service territory. If the grantee decides to use a tenure policy that is different than the standard RV program's time constraints, the policy must be documented in a written tenure policy that applies to all clients. The grantee may decide to extend a client's time beyond the grantee's tenure policy but still within the time constraints of the RV program based on the client's individual needs. If the grantee decides to extend a client's time beyond the grantee's specific tenure policy, they must document their rationale for doing so and keep this documentation in the client's file.¹²

28. Recovery Voucher Maximum Allowable Rates

Grantees must document that the rate charged by the recovery residence is at or below the applicable RV Maximum Allowable Rate at the time of a client's placement and keep this documentation in the client's file. There are two RV Maximum Allowable Rates: one for singles (individuals) and one for families (individuals with other family members staying with them). The

¹² The <u>Client Stay Extension Form</u> can be used to do this.

rates are based off the United States Department of Housing and Urban Development (HUD) defined Fair Market Rates (FMR) for the area where the recovery residence is located. The equations for calculating the RV Maximum Allowable Rates are as follows:

Efficiency FMR * 75% * 135% = RV Maximum Allowable Rate for Singles

Efficiency FMR * 135% = RV Maximum Allowable Rate for Families

Exceptions to the RV Maximum Allowable Rates can be made by DEHCR on a case-by-case basis.

29. Service Animals

If a client has a service animal that is required because of a disability and the animal has been trained to perform work or a necessary task for the client, the RV program can pay for a service animal security deposit, and a service animal monthly fee on a case-by-case basis. Please contact the RV Grant Specialist¹³ for additional information. Information on service animals can be found at ADA.gov Service Animals.

30. Switching Recovery Residences

Once a client is in the RV program, if they need to move to another recovery residence, they can continue to be supported by the RV program. Ideally, there should be no gap between one (1) recovery residence stay and another.

If after exiting the RV program, the client realizes within 30 days or less (their "time away" has been 30 days or less) they would be better served by staying in the RV program, and the RV Administrator has both the capacity and budget to allow the client to re-enter the RV program, the client can do so without the need to recheck eligibility.

Please note, to take advantage of the ability not to recheck eligibility described above, the amount of "no-show" time and "time away" time cannot exceed 30 days combined.

If it has been more than 30 days since the client left the RV program and the client is interested in re-entering the program, the client's eligibility must be rechecked based on their current status.

31. Trauma-Informed Care Practices

Recognizing that many clients have experienced different types 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.

¹³ Contact information can be found on the <u>DEHCR Recovery Voucher Grant Program website</u>.

Chapter 5: Financial Management

1) Tracking of Funds

All funding sources from DEHCR are to be tracked separately. Payroll expenses must have backup documentation from timesheet to paycheck and show allocation of hours by funding source (RV program vs. other programs) and category (client assistance, case management, administrative). Shared functions or associated costs (example, costs associated with the accounting department such as office space) require an allocation plan detailing how only the portion of the staff person's time or the resource dedicated to the RV program was billed to the RV program. Grantees are required to provide access to financial statements, charts of accounts, and expenditure records upon request by representatives of Department of Administration (DOA, DEHCR), Department of Health Services (DHS), or the Legislative Audit Bureau (LAB).

2) Indirect Cost Allocation

Indirect costs billed to the RV grant 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 and if the grantee is also the recipient of state funds under the same or a separate contract program, then 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. Audit reports are due to the Department of Administration 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 <u>Department of Administration's Single Audit Compliance Supplement</u>.

Chapter 6: Payment Schedule, Process & Policy

1) Monthly Funds Disbursement & Quarterly Updates

Grantees may draw on RV funds as reimbursement of expenditures. To initiate each payment, grantees must complete and submit a monthly RV payment request form on or before the fifteenth (15th) of the month following the close of the month prior. 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.

Please see <u>HMIS Client File Elements</u> for more information. Payment requests must be submitted by email to <u>DOADEHCRFiscal@wisconsin.gov</u> copying the Grant Specialist. The subject of the email should follow the below format:

Contract Number (Example: RV 24-01), Grantee Name, Month/2024

On the 15th of the month following the end of the quarter, grantees are required to submit a quarterly budget update describing:

- 1. When the grantee expects to submit the next payment request.
- 2. The grantee's expected future expenditures.
- 3. As applicable, any concerns related to spending the full amount awarded within the performance period.

Grantees will be expected to provide a quarterly update until they have exhausted all funds. Quarterly 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 and update/complete all client files within HMIS <u>within 15 days of the performance period end date</u> or termination of the contract whichever comes earlier. If the payment request is not submitted and all client files are not updated/completed within HMIS 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

DEHCR and DHS will work with ICA to pull reporting directly from HMIS on a quarterly basis at minimum. Therefore, it is extremely important all information in HMIS is kept up to date. <u>Data for the month prior must be in HMIS no later than the 15th of the month afterward, and preferably kept current.</u> DEHCR reserves the right to withhold payment if data in HMIS is not complete. Please see <u>HMIS Client File Elements</u> for a list of the required elements to be kept in HMIS. Please note DEHCR and DHS reserve the right to change reporting requirements.

Training on how to enter data into the HMIS Client Data Module can be found on <u>DEHCR's Recovery Voucher Grant website</u>.

DEHCR and DHS will look at a variety metrics including but not limited to the following:

- 1) Number of people served in each eligible category of homelessness.
- 2) Number of singles, families, and number of people in each household.
- 3) Age, gender, race, ethnicity, and disability status for all individuals enrolled.
- 4) Average number of days from when a client enters the RV program until recovery residence move-in.

- 5) Number of people enrolled in the program without move-in.
- 6) Average number of days clients stay in a recovery residence (while part of the program).
- 7) Percentage reoccurrence of homelessness for those exiting to permanent housing.
- 8) Income and sources at entry, exit and annual reassessment.
- 9) Substance use at exit and annual assessment.

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 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) Links

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

- RV Grant Program Website: <u>DEHCR Recovery Voucher Grant Program</u>
 - Includes templated forms and an overview of HUD homelessness categories and required documentation in the <u>Helpful Links</u>, <u>Resources & Tools</u> section.
- Opioids in Wisconsin: <u>Dose of Reality: Opioids in Wisconsin | Wisconsin Department of Health</u>
 Services
- DHS Recovery Residence Registry Requirements & Application
- <u>DHS Recovery Residence Registry</u> provides a list of all DHS recognized recovery residences by county.
- Find your Continuum of Care (CoC)/Local Homeless Coalition (LHC) based on your county:
 - o Dane, Milwaukee, Racine: Continuum of Care Contact Information in Wisconsin
 - o Balance of State (All Other Counties): Balance of State Local Coalition Look Up
- HUD Fair Market Rates (FMR): Fair Market Rents (40th PERCENTILE RENTS) | HUD USER
- Instructions for pulling from Sam.gov Registration and Exclusion Status

2) Questions

Any questions regarding the RV grant can be directed to the Grant Specialist¹⁴ or DOASupportiveHousing@wisconsin.gov.

¹⁴ Contact information can be found on the DEHCR Recovery Voucher Grant Program website.

Questions on DHS's Recovery Residence Registry and how recovery residences can apply to be on the registry, can be directed to the DHS DQA, Behavioral Health Certification Section at: DHSDQAMentalHealthAODA@dhs.wisconsin.gov. Please note, the RV program does not provide funds for opening a recovery residence, or operational costs.