



D R A F T

City of Madison
Satya Rhodes-Conway, Mayor

**Department of Planning and
Community & Economic Development**
Matt Wachter, Director

Community Development Division
Jim O'Keefe, Director



City of Madison, Wisconsin **2026 Action Plan**

for the period **January 1, 2026** through **December 31, 2026**

*Planned investments in community & neighborhood development projects and related efforts
toward achieving the objectives described in Madison's 2025-2029 Consolidated Plan*

Adopted by the Madison Common Council, XXXX 2026
Submitted to the U.S. Department of Housing & Urban Development (HUD), XXXX 2026

photo credit: Cassius Callender

City of Madison Community Development Division

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Executive Summary

AP-05 Executive Summary

24 CFR 91.200(c), 91.220(b)

The City of Madison Community Development Division (CDD) receives federal formula funds annually from the U.S. Department of Housing and Urban Development (HUD). As a condition of receiving these funds, the City is required to develop a one-year Action Plan that articulates the community development goals on which it will focus these funds. This Action Plan covers the period January 1, 2026, through December 31, 2026. During this period, the City anticipates it will receive the following Federal formula funds:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Emergency Solutions Grant (ESG)

In addition to the formula funds listed above, the City expects to administer HUD Continuum of Care (CoC) funds and HUD Youth Homelessness Demonstration Program (YHDP) funds during the Plan period.

These funds will be used to meet goals and objectives established and approved by the Division's CDBG Committee and the City of Madison Common Council. The Plan's goals and objectives were developed in consultation with citizens, nonprofit organizations, developers, businesses, funding partners, schools and other governmental bodies. Their overarching purpose is to support the development of viable communities with decent housing, suitable living environments and economic opportunities for the City's low- to moderate-income households.

The Community Development Division will pursue these goals and objectives by working with the nonprofit community, housing developers, neighborhood groups, associated businesses, stakeholders, labor union representatives, other local government entities, residents and partners. The Division will also work closely with several other City agencies to jointly plan, implement and evaluate the Plan's core activities.

Summary of the objectives and outcomes identified in the Plan

The 2026 Action Plan includes the goals outlined below, targeting community needs related to affordable housing, economic development and employment, and strengthening neighborhoods.

Goal 1 - Housing Development & Financing: Homeownership

- Housing Rehabilitation and Accessibility Improvements
- Owner-Occupied Housing Development (New Units)
- Homebuyer Assistance (Down Payment)

Goal 2 - Housing Development & Financing: Rental

- Rental Housing Acquisition and/or Rehabilitation
- Rental Housing Development (New Units)

Goal 3 - Homeless Services & Housing Stability

- Services for Homeless and Special Needs Populations
- Tenant-Based Rental Assistance (TBRA)
- Housing Resources

Goal 4 - Small Business Assistance

- Technical Assistance to Micro-Enterprises
- Support to Businesses Expanding to Create Jobs

Goal 5 - Neighborhood Asset Building

- Development and Maintenance of Community Facilities
- Neighborhood Revitalization Plans & Projects

Goal 6 - Program Administration

The Plan's goals are based on assumptions about future funding levels. Because funding levels are subject to annual Congressional appropriations and changes in funding distribution formulas, the Plan's accomplishment projections and planned activities may be subject to commensurate changes.

This Action Plan allocates a total of approximately \$30.5 million in anticipated 2026 Community Development Block Grant, HOME and ESG Entitlement¹ funds, City funds, State HCRI and EHH funds, CDBG and HOME program income, and other funds—plus another \$43.8 million in pre-2026 resources—to support the Community Development program. If additional Entitlement funds are made available, the CDD and the CDBG Committee will hold publicly noticed discussion(s) regarding how best to use those funds. Funds in excess of these previously approved allocations will be made available as part of the currently established reserve funds, for agencies to access throughout the year. The City set "target" allocation percentages to distribute the funds, based upon its *Community Development Program Goals and Objectives*.

Evaluation of past performance

The City of Madison continually strives to improve the performance of its operations and that of its funded agencies. During 2025, the first year of the City's current 2025-2029 Consolidated Plan, the Community Development Division invested over \$13.3 million in the community to meet the goals and objectives outlined in the City's 2025 Action Plan.

CDBG, HOME and ESG funds were targeted primarily toward affordable housing, economic development and employment opportunities, and strong and healthy neighborhoods. For a more detailed summary of the City's evaluation of its past performance, previous Consolidated Annual Performance and Evaluation Reports (CAPERs) can be viewed on the City's website at www.cityofmadison.com/dpced/community-development/reports.

Summary of citizen participation process and consultation process

The City's Community Development Division, in coordination with its CDBG Committee, developed this 2026 Action Plan and its 2025-2029 Consolidated Plan ("ConPlan") with consultation from a diverse group of individuals and organizations. A public hearing on the City's 2025-2026 *Community Development Goals and Objectives* was held on February 6, 2025, as part of the development of the City's new ConPlan. An additional public hearing, specifically on this draft version of the City's 2026 Action Plan, will be held on June 4, 2026. The Action Plan flows from the 2025-2029 Consolidated Plan, which was approved by HUD in July of 2025. Activities included in the 2026 Action Plan were approved at publicly noticed meetings of the CDBG Committee and Common Council. Final approval of 2026 funds took place on November 11, 2025, as part of the City of Madison's 2026 Budget approval process. A limited number of other projects were approved subsequently, at publicly noticed meetings of the CDBG Committee and Common Council.

As part of the larger five-year planning process that includes the 2026 Action Plan period, the City conducted seven focus groups to solicit feedback specifically on homeless services from June through October of 2023. The City also conducted eight consultative group meetings between April and September of 2024 to gather input regarding Madison's top community development needs. Citizen participation was also solicited through two electronic surveys, one for residents and one for partner agencies, sent to over 700 email recipients, forwarded through several community listservs, and made available on the City of Madison Community Development Division's website, accessible via

¹ On April 1, 2026, HUD issued Notice CPD-26-05, which instructed formula grantees (including the City of Madison) not to submit their FY 2026 Action Plans until the actual grant awards (for CDBG, HOME and ESG) have been determined and announced by HUD. As of April 1, 2026, Congress has not yet passed appropriations bills for the federal government's FY 2026 budget year. In accordance with the guidance provided in CPD-26-05, this draft of the City's 2026 Action Plan (AAP) uses estimated funding levels for Madison's annual formula grants from HUD (CDBG, HOME and ESG Entitlement funds). Once actual FY26 allocation amounts become known, the City will adjust the estimated figures in this proposed 2026 AAP to reflect both the City's actual allocation figures and the correspondingly adjusted project/activity funding amounts, prior to submitting the final Plan to HUD.

Madison Public Library computers. Paper copies of the survey were distributed and mailed out upon request to individuals and distributed through the City's three community connectors who focus on reaching the LatinX, Chinese and Hmong communities. A total of 619 surveys were completed by City of Madison residents, with 485 responses from resident perspectives and 134 from community partner perspectives.

During its development, the Consolidated Plan was discussed at publicly noticed CDBG Committee meetings where specific opportunity for public comment is always provided. The draft Plan was made available for review via electronic notification to a diverse array of citizens, agencies, developers, other funders and governmental bodies, and also posted on the Community Development Division's website. A public hearing was held on July 11, 2024, to solicit public comment on needs, trends and potential obstacles for 2025-2029. An additional public hearing to solicit input on the Draft 2025-2029 Consolidated Plan was held on February 6, 2025. Finally, the Plan was provided to the Common Council March 11, 2025, where another opportunity for public comment was provided. All meeting locations were accessible to persons with disabilities, and all meeting notices included information about how to request accommodation, such as a translator or signing assistance.

Summary of comments or views not accepted and the reasons for not accepting them

Not applicable.

The Process

PR-05 Lead & Responsible Agencies

24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Action Plan and those responsible for administration of each grant program and funding source.

The following are the agencies/entities responsible for preparing the Action Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MADISON, WI	Community Development Division
HOME Administrator	MADISON, WI	Community Development Division
ESG Administrator	MADISON, WI	Community Development Division

Table 1 – Responsible Agencies

Lead Agency

The City of Madison has designated its Community Development Division as the lead agency for administration of the CDBG, HOME and ESG programs. The City CDBG Committee serves as the lead policy body overseeing the development of the Consolidated Plan, the Annual Action Plan and related community development programs. The City works with numerous community-based organizations, partners, businesses and funders, as well as other City of Madison departments to plan, develop, implement and evaluate activities outlined in this Plan.

Action Plan Public Contact Information

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This section includes consultation utilized by the City of Madison Community Development Division to reach out to various community partners.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (24 CFR 91.215(l)).

The Community Development Division, in coordination with the CDBG Committee, developed the Action Plan to be consistent with its five-year Consolidated Plan, with consultation from a diverse array of groups and organizations. Throughout the five-year planning process, several themes coalesced, which resulted in the development of the goals and objectives outlined in both the Consolidated Plan and this Action Plan. Affordable housing for both renters and homeowners, economic development and employment, and strong and healthy neighborhoods were each identified as key current and emerging needs. In addition, the need for continued coordination and collaboration with agencies, schools, local governments, and other funders was discussed.

In coordination with the CDBG Committee, CDD staff consulted with a wide range of groups and organizations at various public and accessible locations, as part of both its annual Action Plan process and its related five-year Consolidated Plan process. These included:

- Affordable housing providers
- After school programs
- City/County government
- Community gardens
- Economic development organizations
- Engineering services
- Funding organizations
- Homeless shelters and providers
- Information technology services
- Neighborhood centers
- Persons experiencing homelessness
- Persons with disabilities
- Persons with mental illness
- Residents
- Seniors
- Veterans organizations

Listed below are a few examples of the City's activities intended to enhance this coordination:

- The chairs of the City's Community Development Authority, the Housing Strategy Committee and the CDBG Committee meet regularly to discuss the City's housing and community development programs and to coordinate regarding their implementation.
- CDD staff participate in bi-weekly meetings with the City's Community Development Authority to enhance coordination between the City's housing and community development programs.
- Through membership on the Equity Team, CDD staff participate regularly in the citywide Racial Equity and Social Justice Initiative (RESJI).
- CDD staff engage in a monthly interagency housing team comprised of other City agencies that align with the work CDD does and can impact it, including Building Inspection, Community Development Authority, Planning, Mayor's Office, Zoning, Real Estate Division, Finance, Fire, Public Health, and the Department of Civil Rights.
- CDD staff serve on, and frequently lead, the City's multi-agency Neighborhood Resource Teams, which were established to enhance and improve the provision of City services to neighborhoods.
- CDD staff served as members of the Dane County Housing Advisory Committee and Executive Committee working on a regional housing strategy along with 80+ public, non-profit, and private stakeholders covering different segments of the housing ecosystem.

- CDD staff meet with Wisconsin's regional Workforce Development Board, Dane County, and United Way to improve the alignment and coordination of area nonprofits working in construction employment training programming that is designed to increase the number of women and people of color employed in the construction trades.
- As part of its work to affirmatively further fair housing, CDD coordinates with City Planning staff and local nonprofits to encourage non-traditional housing types; coordinates with the CDA in developing a Comprehensive Housing Strategy; and resists neighborhood opposition to affordable housing. A more comprehensive summary of actions to address identified impediments to fair housing choice is included in **Appendix B**.

The City's Community Development Division regularly participates alongside (and coordinates with) local nonprofits, community service groups and funders. CDD staff meet regularly with several groups, including the Homeless Services Consortium, Third Sector Housing, Home Buyers Round Table and various ad hoc City committees. The goal is to improve delivery methods and initiate systematic improvements. Community Development Division staff also work regularly on housing-related issues with staff of the City's Community Development Authority (CDA).

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Madison is an active partner with the Dane County Continuum of Care (CoC), known locally as the Homeless Services Consortium (HSC). Together, they assess the ongoing needs of homeless populations and those at risk of homelessness, and respond with new or expanded services and programs as resources become available. The City of Madison is the collaborative applicant for the annual CoC application to HUD. The City employs the CoC Coordinator using its annual Continuum of Care Planning Grant from HUD. This position staffs the HSC Board of Directors, which meets on a monthly basis to discuss homeless needs.

Through its membership in the Homeless Services Consortium, the City played an active role, including providing funding, for development of *Dane Forward: A Five-Year Plan to Prevent and End Homelessness*. This plan was developed in collaboration with the City, County, HSC and HomeBase, and will serve as a blueprint for ending homelessness in Madison and Dane County.

The City has long supported, and will continue to give preference to, projects that develop supportive housing units that serve special needs populations. Developments that receive Affordable Housing Development Funds from the City must have some units set aside to be filled by the CoC's Coordinated Entry list. Staff at the property work with the local CoC to connect people on the Coordinated Entry list with housing opportunities. The City also uses General Purpose Revenue (GPR) to fund outreach efforts that connect people experiencing homelessness with housing and services provided by CoC agencies.

The services to which people experiencing homelessness are connected include:

- | | |
|---|--------------------------------|
| • Long-term case management and other supportive services such as CCS | • Mediation services |
| • Day and overnight shelter case management services | • Rapid re-housing |
| • Housing navigation services | • Permanent supportive housing |
| • Restorative justice court program and other legal advocacy | • Sober living programs |
| • Eviction prevention financial assistance and services | • Transitional housing |
| | • Fair housing services |

By supporting the Coordinated Entry System, the City is able to support the needs of vulnerable underserved populations such as veterans, youth and families. The City provides a portion of funding for Coordinated Entry in Dane County, the goal of which is to move more individuals from homelessness to stable housing as quickly as possible.

Describe consultation with the Continuum of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

Dane County CoC has a Board of Directors that oversees several committees that guide the CoC's objectives, including Shelter Providers, Education & Advocacy, Core (addressing performance, written standards and coordinated entry) and Funders Committees. In its role as partner in the CoC, the City of Madison ensures that City staff leads or has a representative on most of these committees. Through the committees, the CoC has been able to develop a set of written standards the City references when developing proposals for homeless facilities and services, and when awarding or administering ESG and other homeless-related funds. Through an email distribution list, HSC members are notified of key CDBG Committee meetings where input is requested on City plans and performance.

Notifications regarding City funding processes are also sent via e-mail distribution. The City reviews written applications from those who apply for ESG and other homeless-focused funds. Members of the CoC Board of Directors are invited to review applications and make funding recommendations. The CoC Board approves allocation of ESG funding. The allocation and award process includes negotiation with the applicant regarding its performance goals, as well as CDBG Committee approval of the grant award and outcomes. Each written agreement includes a scope of service and standards for assessment of performance. The CoC regularly reviews information from HMIS to determine program effectiveness. The City currently contributes approximately 2% of its annual ESG allocation toward the operation of the HMIS system.

Describe agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities.

Agency/Group/Organization	See Appendix A-2.
Agency/Group/Organization Type	
What section of the Plan was addressed by Consultation?	
How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting.

As part of the 2026-focused planning processes, the City of Madison undertook significant outreach and consultation with a diverse array of for-profit and nonprofit agencies in an effort to maximize contributions toward developing the Plan's needs, priorities and strategies.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care - <i>Dane Forward: A Five-Year Plan to End Homelessness in Dane County (2024-2029)</i>	City of Madison Community Development Division	<i>Dane Forward: A Five-Year Plan to End Homelessness in Dane County (2024-2029)</i> : The goals of the Strategic Plan are closely coordinated with the goals of the CoC. CDD is an applicant and is the administering agency for CoC and Emergency Solutions Grant, in addition to the City's CDBG and HOME allocations.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Madison Comprehensive Plan – <i>Imagine Madison</i>	City of Madison Planning Division	The City of Madison Comprehensive Plan, <i>Imagine Madison</i> , was updated and adopted in December 2023. Imagine Madison uses data and input from the community to shape the City's long-term land use policies and investments to equitably and sustainably manage Madison's projected future growth. The Plan looks 20 years into the future but prioritizes City strategies and actions for the decade ahead. The Comprehensive Plan is required to be updated every ten years, next scheduled for 2028. Strategies identified in the Comprehensive Plan are incorporated in all of the Plan's goals.
Analysis of Impediments to Fair Housing Choice (2025-2029)	City of Madison	The AI assesses housing disparities and barriers to housing access for groups of residents based on their protected class status. This report provides useful data to guide equitable decision-making about City funding for housing and planning initiatives, helping inform ways to make Madison a more sustainable and equitable City for everyone. Actions to address impediments identified in the AI are incorporated in the Plan. (See Appendix B.)
5-Year Public Housing Agency Plan (DRAFT)	Community Development Authority of the City of Madison	Housing-related issues are addressed as part of the Plan's "Housing Development & Financing: Homeownership," "Housing Development & Financing: Rental" and "Homeless Services & Housing Stability" goals.
City of Madison Housing Strategy Committee's Report (Draft)	City of Madison Housing Strategy Committee	The Committee met regularly from December to July to consider and formulate recommendations based upon three main questions: (1) How can the City support the creation of more ownership housing types? (2) How can the City help scale up the development of new affordable rental units beyond the current 400 per year pipeline? (3) How can the City support the creation of affordable student housing? The Common Council requested that recommendations focus on housing choices for people with the lowest income and expanding housing options in every Madison neighborhood. Housing-related issues are addressed as part of the Plan's "Housing Development & Financing: Homeownership," "Housing Development & Financing: Rental" and "Homeless Services & Housing Stability" goals.
Economic Development Strategy – <i>Connect Madison</i> (2017)	City of Madison Economic Development Division	The <i>Connect Madison</i> Economic Development Strategic Plan combines in-depth economic data analysis with input from hundreds of community members, including youth, public officials, education leaders, and business leaders. The plan addresses economic development issues, strategies, and projects, some of which align with Madison's Consolidated Plan's "Small Business Assistance" goal.
Dane County Regional Housing Strategy Strategic Action Plan – A Road Map to Solving Dane County's Housing Crisis	Dane County Housing Strategy	This plan provides information on regional housing trends and needs, with a focus on affordable housing development and workforce development, regional growth, and individual production targets for each municipality. The 80-member Housing Advisory Committee responsible for the plan included strategies to guide and prioritize investments in housing, tenant protections/stability, and education. The strategies identified in the Dane County Regional Housing Strategy Action Plan are incorporated into the City's Plan.
Area Plans – West Area Plan, Northeast Area Plan, and South Madison Plan	City of Madison Planning Division	The City's Planning Framework divides the City into 12 geographies. Each of these geographies has an area plan put together every 10 years to help guide future growth. City Planning staff conduct multiple engagements with community members to gather their thoughts on the issues and priorities for the geography. Some themes from the West Area Plan included a need for smaller scale "Missing Middle" housing types, a desire for an increase in information on our first-time home buyer programs, property tax assistance programs for seniors, low-cost mortgage and rehabilitation loans, and programs to help grow opportunities for entrepreneurs. The Northeast Area Plan included recommendations to increase support for unhoused population, promote local business growth, increase "Missing Middle" housing types, and increase affordable housing opportunities.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
South Madison Reinvestment Strategy for Equity (RISE) Report (2023)	UW-Madison Population Health Institute and City of Madison	This report focuses on impacts and effects of TIF funding in South Madison and perception of residents of South Madison. The report is representative of the priorities and concerns of members of South Madison in relation to topics of displacement pressures, community wealth-building strategies, affordable housing strategies and civic engagement. Housing-related issues are addressed as part of the Plan's "Housing Development & Financing: Homeownership," "Housing Development & Financing: Rental" and "Homeless Services & Housing Stability" goals. Business development issues are addressed as part of the Plan's "Small Business Assistance" goal.
Older Adults Services and Programming	City of Madison Community Development Division and EQT by Design	The report describes the needs of older adults in Madison, which include bringing programming to where older adults are located and helping to build a stronger connection between agency partners that provide older adult programming and neighborhood centers that can provide space in communities where older adults reside. It additionally describes the need to better serve BIPOC and LGBTQ+ older adults. The information in the report helped inform this Plan's sections NA-45, which identifies the older adult population as one having higher rates of disabilities, and NA-50, which describes the city's public facilities which include neighborhood centers.
Race to Equity 10-Year Report: Dane County	Kids Forward	The report uses a root cause approach to understand how race, class, and in some cases gender, impact Black Dane County residents and help determine why extreme and persistent Black-White racial disparities continue in Dane County. The report focuses specifically on economic well-being, health and education outcomes. The <i>Analysis of Impediments to Fair Housing</i> addresses how race and class impact access to housing. Under-resourced and disconnected neighborhoods are addressed as part of the Plan's "Neighborhood Asset Building" goal. Workforce challenges are addressed as part of the Plan's "Small Business Assistance" goal.
Dane County Early Childhood Zones 2023 Annual Summary	Dane County Department of Health and Human Services	The Dane County Early Childhood Zones (ECZs) are a collaboration of organizations that work together to support and increase the protective factors of families who are pregnant and/or have children under the age of four. Two of the three zones are either all or partially located within the City of Madison. The report describes the importance of wrap-around services to families that include housing, employment, and home visiting programs. The importance of these services to families is addressed in section SP-70 (Anti-Poverty Strategy).
Accessible Housing Plan Goals	Department of Civil Rights	Recommendations on how to best use and sustain accessible housing units. This includes limiting unnecessary waste that can occur when modifications are removed after a tenant who required the accessibility features has left. Keeping the modifications would help increase the availability of such units. Other specific recommendations include developing an incentive program for property owners to rent modified units/units with accessible features to people with mobility impairments; including accessibility features as a requirement of City subsidies for multifamily weatherization and repair programs; and, collaborating with community partners to connect renters who need modifications with property managers that have modified/accessible units available. This information was taken into account when targeting housing rehabilitation and accessibility improvements in Goal 1 of this Consolidated Plan.
Funding Priorities for 2023-24: By Youth for Youth (BYFY) Report	By Youth For Youth	Madison and Dane County youth identified several funding priorities for the BYFY funding process in which youth evaluate proposals from their peers on pre-identified priority areas (set by BYFY youth) and then award small amounts of funding for their peers to carry out the projects. Youth specifically identify climate change, poverty, food insecurity and homelessness as funding priorities. This information was taken into account in sections NA-50 (which describes the City's goal of supporting energy-efficient community facilities), NA-40 (Homeless Needs Assessment), MA-30 (Homeless Facilities and Services), SP-40 (Institutional Delivery System) and SP-60 (Homelessness Strategy).

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Coordinated Community Plan	Madison/Dane CoC - Youth Homelessness Demonstration Program	The Coordinated Community Plan identifies projects and service providers that can meet the needs of youth and young adults experiencing and at-risk of homelessness in Madison/Dane County and support safe and stable housing. The needs and work of the City and Dane County around homelessness is addressed in sections NA-40 (Homeless Needs Assessment), MA-30 (Homeless Facilities and Services), SP-40 (Institutional Delivery System) and SP-60 (Homelessness Strategy).
Public Health Neighborhood Assessments and Violence Prevention Engagement	Public Health of Madison and Dane County	Public Health of Madison and Dane County has taken on numerous projects determined to support violence prevention including neighborhood assessments and engagements, which have included hearing from residents about housing quality concerns. Housing quality problems are explored in many of the Needs Assessment sections as well as in section MA-20 (Condition of Housing).
Hmong Youth: Dane County Youth Assessment (DCYA)	Public Health of Madison and Dane County	This report describes data from the DCYA for Hmong students. Key themes include "establishment of community spaces to provide culturally and linguistically responsive education opportunities for Hmong parents and students" and "cultivating a sense of belonging and inclusion." The report also describes the need for additional data on the Hmong community. City staff worked specifically with the Hmong Community Connector to get feedback via the Consolidated Plan survey. Additionally, this desire for community spaces is addressed in section NA-50 (Non-Homeless Community Development Needs).
Public Health's Housing Quality Plan	Public Health of Madison and Dane County	Public Health conducted a series of interviews with individuals living in the Allied Drive neighborhood in Madison. The results indicate challenging interactions between renters and landlords, as well as health and safety concerns including pests, mold, unsafe stairs, outside doors that don't lock, etc. Housing quality is addressed in section MA-20 (Condition of Housing) as well as in the <i>Analysis of Impediments to Fair Housing</i> .
EQT by Design Older Adult Services and Program Report	EQT by Design	EQT by Design assessed the needs of older adults across the Madison community. Some of the key needs identified included access to reliable transportation and culturally relevant programming close to where they live, as well as a desire to age in place. The City's Property Tax Assistance for Seniors program seeks to help older adults age in place.
Elevate Madison Region: Comprehensive Economic Development Strategy (2024-2028)	MadREP	In Elevate Madison Region, MadREP presents a strategic blueprint for regional economic growth, aiming to increase workforce participation and tackle upcoming challenges. The plan addresses the future of technology, along with the disruptions and new opportunities that have emerged in the wake of the pandemic's impact on the workforce. This Plan incorporates the effects and interconnectedness of housing, health and safety, education onto the livability and viability of the workforce pool in the region. Some of the objectives identified in the Dane County strategies were reviewed to align with our microenterprise and economic development goals.

As part of its ongoing work, the Community Development Division consults with local stakeholders and organizations, as well as state and federal agencies, regarding their planning processes. A diverse array of local, regional, state and federal planning efforts were considered during the development of the Action Plan.

AP-12 Participation

24 CFR 91.105, 91.200(c)

Summarize citizen participation process and how it impacted goal-setting.

On a regular and ongoing basis, the City's CDBG Committee serves as the main citizen participation resource for the community development process. The Committee meets monthly, with additional meetings scheduled as needed, and regularly provides time within each meeting for public comments and presentations. The Committee annually holds at least two public hearings to assess the overall progress of its investment program and to solicit feedback about future

and emerging needs within the community. In addition to the two public hearings held in conjunction with the Action Plan, monthly CDBG Committee meetings were used to solicit input and share information. The CDD's Housing and Community Investments (HCI) Unit staff undertook significant citizen participation efforts as part of the City's larger five-year plan. Among those efforts was an extensive survey, sent to over 700 email recipients and distributed at various public locations, as well as numerous focus groups.

As a policymaking body—with members appointed by the Mayor—the CDBG Committee also serves as a primary mechanism for citizen participation regarding the City's community development program. The Committee includes nine membership slots, designating two for Alders and two for low- to moderate-income individuals. The Committee is the lead policymaking group for the community development program, listening to and acting upon recommendations from citizens, community groups, nonprofit agencies and businesses as it plans, makes funding recommendations for and evaluates the overall program.

In the year leading up to the preparation of the 2026 Action Plan, the Committee regularly held discussions and received public comment regarding the use of HOME, CDBG and ESG funds, as well as other local, State and federal funds. All funding recommendations and/or decisions were made in open, publicly noticed meetings.

The CDBG Committee and CDD initiated and/or participated in a number of outreach and consultation efforts designed to broaden participation from community groups and other stakeholders. These efforts included:

- Providing an extensive website (www.cityofmadison.com/cdd) to report on five-year goals, annual projects and special issues. The site includes a means to directly comment on any aspect of the Plan or the program.
- Providing staff representation on the City's Neighborhood Resource Teams (NRTs), and regularly soliciting comments on emerging community needs and recommended solutions.
- Actively participating in various groups such as the Homeless Services Consortium, the City-County Homeless Issues Committee, Home Buyers Round Table, and other groups related to housing issues.
- Meeting quarterly with area neighborhood center directors to better understand emerging needs in neighborhoods throughout the City, and develop effective strategies to meet these needs.
- Holding meetings with nonprofit service providers and stakeholders in targeted neighborhoods.
- Meeting with an array of service groups that work with underrepresented populations.
- Providing interpreters at meetings, as needed.
- Providing information in alternate formats, as needed.

The Community Development Division initiated several efforts to broaden its outreach and the participation of various community groups. In order to gather additional input, the draft Consolidated Plan was made available for review online via public workstations at an array of Madison Public Library branches and neighborhood centers. CDD used the following processes to receive input on the Consolidated Plan process as the draft report was introduced:

- Posted the draft Plan on the Division website.
- Advertised via specific homeless, housing and business email distribution lists, regarding public hearings on the draft Plan.
- Sent the draft Plan to the Neighborhood Resource Teams as part of a strategy to gather input from underserved communities.
- Continued to solicit feedback from community partners, residents and local organizations, regarding needs the City should be addressing with HUD funding.

Citizen Participation Outreach

The Community Development Division posted all 2026 programs and contracts on the Division's website on January 1, 2026. This contract list is publicly accessible and remains posted on the website to date. The public is also notified of any new projects receiving federal funds throughout 2026 through the City's Committee process. New projects must be listed as an agenda item on Common Council, CDBG Committee and Finance Committee agendas. There is a public notice of each meeting and the opportunity for public comment at each session.

The draft 2026 Action Plan was posted on the Community Development Division's website on May 19, 2026. A notice was sent out via email listservs and also posted publicly to online City calendars on May 19, 2026, listing the website and the location, date and time of the public hearing, as well as where written comment could be submitted. Public comments on the Plan will be accepted through Friday, June 19, 2026 (a total public comment period of 31 days).

Community Development

Home Housing Children & Youth Neighborhoods Community Resources Contracts & Funding Reports

City of Madison / Department of Planning & Community & Economic Development / Community Development / Reports

Reports

City of Madison and Dane County Consolidated Plan

Contact Us

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Madison, WI 53701

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Public Comment Opportunity

Draft 2026 Annual Action Plan (AAP), PDF is available for public comment. We will accept public comment on this draft **through June 19, 2026**. Comments may be made in-person at the public hearing for the Community Development Block Grant Committee, scheduled for June 4, 2026, or submitted to the Community Development Division in writing by June 19, 2026, via mail – CDD Attn: Public Comment, PO Box 2627, Madison, WI 53701 or email – cdd@cityofmadison.com. Comments will be incorporated into discussions for the final Action Plan.

Draft Posted May 19, 2026

The City of Madison received the following comments from the public during the comment period: (TBD).

The following specific outreach efforts and meetings were conducted regarding the 2026 Action Plan.

Mode of Outreach	Target of Outreach	Summary
Public Hearing	Non-targeted/broad community	A public hearing on the draft Plan was held on June 4, 2026, at the CDBG Committee meeting. A draft of the Plan was posted and made available for review. The public was notified of the meeting through email distribution and publicly posted notices (both physical placement and online) of City meetings. The CDD website also contained information about the meeting. The widely distributed CDBG Committee agenda also included notice and information about the public hearing. Citizens were given the opportunity to attend the meeting, send their comments by mail or email, or contact CDD's HCI Unit.
Internet Outreach	Non-targeted/broad community	Throughout the citizen participation period, the City's draft 2026 Action Plan was posted for public comment on the CDD website, along with a copy of the adopted 2025-2029 Consolidated Plan and information about how to participate in related public processes.
Public Meeting	Non-targeted/broad community	A publicly noticed meeting of the City Finance Committee was held on June 15, 2026. Approval of the 2026 Action Plan was listed on the agenda for action.
Public Meeting	Non-targeted/broad community	A publicly noticed meeting of the Madison Common Council was held on June 23, 2026. Approval of the 2026 Action Plan was listed on the agenda for action.

Table 4 – Citizen Participation Outreach

(The City of Madison's *Citizen Participation Plan* is also attached to this Action Plan as **Appendix A.**)

Annual Action Plan

AP-15 Expected Resources

24 CFR 91.220(c)(1,2)

The anticipated resources articulated in this Action Plan are based on assumptions about 2026 funding levels. Because funding levels are subject to annual Congressional appropriations and changes in funding distribution formulas, the Plan's accomplishment projections and planned activities may be subject to commensurate changes.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$ 2,041,348	\$ 1,158,000	\$ 3,526,344	\$ 6,725,692	\$ 5,957,823	Estimated five-year average annual CDBG Entitlement allocation: \$1,981,642
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership Tenant Based Rental Assistance (TBRA)	1,347,207.78	890,000	14,751,868	16,989,075.78	3,710,586	Estimated five-year average annual HOME PJ allocation: \$1,241,745
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	179,740	0	83,417	263,157	505,960	Estimated five-year average annual HESG Entitlement allocation: \$168,231

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
EHH (ESG, HPP, HAP)	public - state	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Services Transitional housing Other	625,455	0	0	625,455	1,890,400	Estimated five-year average annual EHH allocation: \$632,600
HCRI	public - state	Homebuyer assistance	161,500	200,000	121,436	482,936	429,999	Estimated average award per 2-year HCRI grant period: \$286,666
City of Madison	public - local	Housing Services	23,970,198	0	25,333,535	49,303,733	64,156,000	Estimated five-year average annual City allocation: \$21,252,000

Table 5 – Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

The City developed this Action Plan with the expectation that the Federal government will provide approximately \$3.5 million for the 2026 program year, through such grant programs as CDBG, HOME and HESG. The City expects to leverage these funds with its own housing funds, as well as State of Wisconsin funds for homeless services and homebuyer assistance.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the Plan.

Not applicable.

AP-20 Annual Goals and Objectives

24 CFR 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Outcome Indicator tied to Federal Funds Only
1	Housing Development & Financing: Homeownership	2026	2026	Affordable Housing	Citywide	Affordable Housing	CDBG: \$1,249,469 HOME: \$5,244,081 HCRI: \$431,436 City of Madison: \$3,743,228	100 units of homeowner housing rehabilitated 2 units of homeowner housing added 60 homebuyers provided with direct financial assistance
2	Housing Development & Financing: Rental	2026	2026	Affordable Housing	Citywide	Affordable Housing	CDBG: \$1,556,249 HOME: \$9,193,653 City of Madison: \$40,654,240	11 units of rental housing constructed 353 units of rental housing rehabilitated
3	Homeless Services & Housing Stability	2026	2026	Affordable Housing Homeless Non-Homeless Special Needs	Citywide	Affordable Housing	CDBG: \$365,000 HOME: \$2,327,621 ESG: \$246,083 EHH (ESG / HPP / HAP): \$617,040 City of Madison: \$2,924,643	2,600 homeless persons assisted with overnight shelter 85 persons assisted through homelessness prevention services 400 persons assisted with other homeless services 30 tenant households provided with TBRA/RRH 2,000 persons assisted with housing resources
4	Small Business Assistance	2026	2026	Non-Housing Community Development	Citywide	Economic Development and Employment	CDBG: \$1,435,266	1,400 businesses assisted
5	Neighborhood Asset Building	2026	2026	Non-Housing Community Development	Citywide	Strong and Healthy Neighborhoods Effective Planning and Program Administration	CDBG: \$1,521,339 City of Madison: \$1,078,067	10,800 persons assisted through the creation or improvement of Public Facilities or Infrastructure 1,200 persons assisted through concentration neighborhood planning efforts and associated revitalization activities

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Outcome Indicator tied to Federal Funds Only
6	Program Administration	2026	2026	Planning / Administration	Citywide	Effective Planning and Program Administration	CDBG: \$598,369 HOME: \$223,720.78 ESG: \$17,0074 (incl. HMIS) EHH (ESG / HPP / HAP): \$8,415 HCRI: \$51,500 City of Madison: \$903,555	100 contracts managed by CDD staff

Table 6 – Goals & Objectives Summary

Objective Descriptions

1	Objective Name	Housing Development & Financing: Homeownership
	Description	Preserve, improve and expand the supply of affordable housing for homeowners.
2	Objective Name	Housing Development & Financing: Rental
	Description	Preserve, improve and expand the supply of affordable housing for renters.
3	Objective Name	Homeless Services & Housing Stability
	Description	Support vulnerable populations in stabilizing their homes and families.
4	Objective Name	Small Business Assistance
	Description	Improve economic opportunities for individuals and business owners.
5	Objective Name	Neighborhood Asset Building
	Description	Develop, maintain and support community facilities; support the development of revitalization plans and implementation of associated projects.
6	Objective Name	Program Administration
	Description	Implement a well-managed Community Development Program with effective progress toward five-year goals.

Table 7 – Objective Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 24 CFR 91.215(b):

Approximately 15 low- and moderate-income families will be provided affordable housing, as defined by HOME 24 CFR 91.215(b). These activities include Habitat for Humanity's and Movin' Out's Homeownership Programs.

The City of Madison's Community Development Division, through CDD-staffed citizen committees, makes its funding allocation decisions based on a Request for Proposals (RFP) process. Through this process, funds are awarded to eligible activities that support the goals (and address the priority needs) articulated as part of the Action Plan. Expected resources cited in RFPs are based on assumptions about future funding levels, and the allocations awarded to activities are contingent upon the City's receipt of sufficient funds for the period covered by the RFP.

As required by HUD regulations at 24 CFR 92, the City plans to use at least 15% of its annual HOME allocation for eligible housing development activities to be undertaken by locally certified Community Housing Development Organizations (CHDOs), a roster which presently includes Madison-Area Community Land Trust (MACLT) and Movin' Out.

As required by HUD regulations at 24 CFR 576, the City plans to use no more than 60% of its annual ESG allocation for homeless outreach and emergency shelter activities. It will also comply with applicable ESG Match requirements, as well as the 7.5% cap on administration.

Projects

#	Project Name
1	Housing Rehab and Accessibility
2	Owner-Occupied Housing Development
3	Homebuyer Assistance
4	Rental Housing
5	Homeless and Special Needs Populations
6	Tenant-Based Rental Assistance (TBRA)
7	Housing Resources
8	Micro-Enterprise Development
9	Job Creation and Business Expansion
10	Capital Improvements for Community Organizations
11	Neighborhood Revitalization Plans and Projects
12	Overall Program Administration
13	ESG26 Madison

Table 8 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs.

The allocation of funds for the activities listed in this Action Plan are closely aligned with the top housing and community development needs identified in the needs assessment and housing market analysis articulated in the City's 2025-2029 Strategic Plan, and through input contributed by stakeholders and citizens who participated in its development.

The primary obstacle to addressing underserved needs continues to be the diminishing availability of funds vis-à-vis the increasing funding needs of the nonprofit agencies with whom the City contracts for services. To illustrate this point, during its RFP processes, the City routinely receives funding proposals requesting funds far in excess (often up to 160% or more) of the total projected funds available.

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehab and Accessibility	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Housing Rehabilitation and Accessibility Improvements	
	Goals Supported / Needs Addressed	Housing Development & Financing: Homeownership / Affordable Housing	
	Funding	CDBG: \$1,163,469	
	Description	Preserve and improve the supply of affordable housing for homeowners and landlords	
	Target Date	12/30/2026	
	Expected Beneficiaries Tied to Federal Funding	Approximately 100 LMI households will benefit from the activities proposed within this Project.	
	Location Description	Citywide.	
	Planned Activities	PH Minor Home Repair Program Habitat Home Repair Program PH Major Home Rehab Loan Program MACLT Housing Maintenance Fund	
2	Project Name	Owner-Occupied Housing Development	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Owner-Occupied Housing Development (New Units)	
	Goals Supported / Needs Addressed	Housing Development & Financing: Homeownership / Affordable Housing	
	Funding	HOME: \$3,578,857 City: \$2,990,000	
	Description	Expand the supply of affordable housing for homeowners	
	Target Date	12/30/2026	
	Expected Beneficiaries Tied to Federal Funding	At least 2 LMI households will benefit from the activities in this project tied to federal funding. An additional 6 LMI households are expected to benefit from City-funded investments associated with the Plan activities below.	
	Location Description	Citywide.	
	Planned Activities	Anchorhaus Owl Creek Homeownership Development TSCC Owl Creek Homeownership Development Ho-Chunk Owl Creek Homeownership Development WPHD Owl Creek Homeownership Development Kaba Baal Owl Creek Homeownership Development Housing Development Reserve Fund activities TBD	
3	Project Name	Homebuyer Assistance	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Homebuyer Assistance (Down Payment)	
	Goals Supported / Needs Addressed	Housing Development & Financing: Homeownership / Affordable Housing	
	Funding	CDBG: \$86,000 HOME: \$1,665,224 HCRI: \$431,436 City of Madison: \$753,228	
	Description	Improve housing stability for homebuyers	
	Target Date	12/30/2026	
	Expected Beneficiaries Tied to Federal Funding	At least 60 LMI households will benefit from the activities proposed within this project that are funded by federal dollars. An additional 22 LMI households are expected to benefit from City- and state-funded investments associated with the Plan activities below.	
	Location Description	Citywide.	
	Planned Activities	Habitat Affordable Homeownership for Families MO Homeownership Program Ho-Chunk Homebuyer Assistance ULGM Homebuyer Assistance Home-Buy The American Dream (HBAD) Program	

4	Project Name	Rental Housing	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Rental Housing Acquisition and/or Rehabilitation Rental Housing Development (New Units)	
	Goals Supported / Needs Addressed	Housing Development & Financing: Rental / Affordable Housing	
	Funding	CDBG: \$1,556,249 HOME: \$9,193,653 City of Madison: \$40,654,240	
	Description	Preserve, improve and expand the supply of affordable housing for renters	
	Target Date	12/30/2026	
	Expected Beneficiaries Tied to Federal Funding	Approximately 364 LMI households will benefit from the activities proposed within this project through federal funds. An additional 240 LMI households are expected to benefit from City-funded investments associated with the Plan activities below.	
	Location Description	Citywide.	
	Planned Activities	Small-Scale Rental Rehab Loan Program Capital Improvements for Non-profit Housing (CINH) Program C4C Milwaukee Street Rehab and ADU CDA/MRCDC Phase 4 Scattered Site Preservation CDA/MRCDC Theresa Terrace Redevelopment CDA/MRCDC Triangle Phase 1 Redevelopment Ellis Potter Apts. Rental Housing Development HI Roth Street PSH Development Kelly Station Rental Housing Development Merchant Place Apts. Rental Housing Development Merchant Place Senior Apts. Rental Housing Development MSP Yellowstone Apts. Rental Housing Development Parker Place Apts. Rental Housing Rehab The Point on Washington Apts. Rehab Red Pine Housing Cooperative Acquisition and Rehab ReJenerate Rental Housing Cooperative Development SSD/MACHA Zapata Housing Cooperative United Residences Rental Housing Development Affordable Housing Initiative activities TBD Housing Development Reserve Fund activities TBD	
5	Project Name	Homeless and Special Needs Populations <i>[also see Project #13]</i>	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Services for Homeless and Special Needs Populations	
	Goals Supported / Needs Addressed	Homeless Services & Housing Stability / Affordable Housing	
	Funding	CDBG: \$200,000 HOME: \$1,104,300 City of Madison: \$2,464,000 EHH (ESG / HPP / HAP): \$617,040	
	Description	Improve housing stability for renters, homeless and special needs populations	
	Target Date	12/30/2026	
	Expected Beneficiaries Tied to Federal Funding	Approximately 5,115 homeless persons or persons at-risk of homelessness will benefit from the shelter, street outreach and homelessness prevention activities proposed within this Project. <i>(Figure includes anticipated beneficiaries from certain ESG-funded activities under Project #13, ESG25 Madison.)</i>	
	Location Description	Citywide.	
	Planned Activities	CFC Severe Weather Emergency Hotel Program CFC Street Outreach & Mediation DCHS The Beacon Support HI Roth Street PSH Supportive Services ICA Dane CoC Coordinated Entry MSM Housing-Focused (aka HHH) Street Outreach Porchlight Men's Shelter Operations Porchlight Permanent Housing Case Management TSA Diversion Services TSA Family Shelter TSA Single Women's Shelter YWCA Family Shelter Rent subsidy, shelter and homelessness prevention activities TBD through 2026-2027 state RFP process (EHH)	

6	Project Name	Tenant-Based Rental Assistance (TBRA) / Rapid Re-Housing (RRH)	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Tenant-Based Rental Assistance (TBRA) / Rapid Re-Housing (RRH)	
	Goals Supported / Needs Addressed	Homeless Services & Housing Stability / Affordable Housing	
	Funding	CDBG: \$105,000 HOME: \$300,000 City of Madison: \$ 66,000	
	Description	Rental assistance payments to eligible households	
	Target Date	12/30/2026	
	Expected Beneficiaries Tied to Federal Funding	Approximately 30 LMI tenant households will be assisted by the activities proposed within this Project.	
	Location Description	Citywide.	
	Planned Activities	LSS Welcome Home Madison (RRH) Porchlight Men's Shelter TBRA MSM Singles Rapid Rehousing (RRH) TSA Family Shelter TBRA MSM Singles Rapid Rehousing (RRH) TBRA TSA Single Women's Shelter TBRA	
7	Project Name	Housing Resources	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Housing Resources	
	Goals Supported / Needs Addressed	Homeless Services & Housing Stability / Affordable Housing	
	Funding	CDBG: \$60,000 HOME-ARP: \$923,321 City of Madison: \$394,643	
	Description	Provide information or other non-monetary resources to LMI persons, and support access to affordable housing opportunities	
	Target Date	12/30/2025	
		Approximately 2000 LMI households will benefit from the public services activities proposed within this Project.	
	Location Description	Citywide, with some activities targeted to Madison's Southside and Owl Creek neighborhoods	
	Planned Activities	TRC Tenant Services ULGM Homebuyer Education / UEE Center TRC Eviction Prevention & Defense Partnership (EDDP)	
8	Project Name	Micro-Enterprise Development	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Technical Assistance to Micro-Enterprises	
	Goals Supported / Needs Addressed	Small Business Assistance / Economic Development and Employment	
	Funding	CDBG: \$553,306	
	Description	Assist entrepreneurs, particularly those from populations that are under-represented, seeking to start or grow small businesses and micro-enterprises (as defined by HUD) that create jobs	
	Target Date	12/30/2025	
	Expected Beneficiaries Tied to Federal Funding	Approximately 560 entrepreneurs/micro-enterprises will be assisted via the activities proposed within this Project.	
	Location Description	Citywide.	
	Planned Activities	MBCC Smarter Black Businesses Economic Development Reserve Fund activities TBD WWBIC Business Development Loans	

9	Project Name	Job Creation and Business Expansion	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Support to Businesses Expanding to Create Jobs	
	Goals Supported / Needs Addressed	Small Business Assistance / Economic Development and Employment	
	Funding	CDBG: \$881,960	
	Description	Create jobs, especially for under-represented individuals, by supporting new or expanding businesses	
	Target Date	12/30/2025	
	Expected Beneficiaries Tied to Federal Funding	Approximately 15 jobs for LMI persons will be created or retained across an estimated 5 assisted small businesses as a result of the activities proposed within this Project.	
	Location Description	Citywide.	
	Planned Activities	MDC Business Loan Program	Economic Development Reserve Fund activities TBD
10	Project Name	Capital Improvements for Community Organizations	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Development and Maintenance of Community Facilities	
	Goals Supported / Needs Addressed	Neighborhood Asset Building / Strong and Healthy Neighborhoods	
	Funding	CDBG: \$933,466 City of Madison: \$1,078,067	
	Description	Create or improve safe, accessible, energy-efficient and well-maintained community and neighborhood facilities	
	Target Date	12/30/2025	
	Expected Beneficiaries Tied to Federal Funding	Approximately 10,800 LMI persons will benefit from the activities proposed within this Project.	
	Location Description	Citywide.	
	Planned Activities	Chrysalis CFL Atwood Avenue Acquisition Solace Friends CFL Exterior Facility Improvements Tellurian CFL Main Street Leasehold Improvements YWCA CFL Empowerment Center Rehab	River Food Pantry Darwin Road Acquisition Community Facilities Loan (CFL) Program Acquisition/Rehab Reserve Fund activities TBD
11	Project Name	Neighborhood Revitalization Plans and Projects	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Neighborhood Revitalization Plans & Projects	
	Goals Supported / Needs Addressed	Neighborhood Asset Building / Strong and Healthy Neighborhoods	Program Administration / Effective Planning and Program Administration
	Funding	CDBG: \$587,873	
	Description	Help residents within designated neighborhoods identify, plan for and implement projects and activities that promise to enhance the quality of life for neighborhood residents	
	Target Date	12/30/2025	
	Expected Beneficiaries	Approximately 1,200 LMI persons will benefit from neighborhood revitalization activities proposed within this Project.	
	Location Description	Concentration neighborhood planning efforts for 2026 are focused on the Northeast neighborhood areas. Ongoing revitalization projects/activities arising from prior Plans include those focused on the South Madison and Hawthorne-Truax neighborhood areas.	
	Planned Activities	Concentration Neighborhood Planning Hawthorne-Truax Neighborhood Revitalization Projects TBD	Northeast/NEAP Neighborhood Revitalization Projects TBD South Madison Neighborhood Revitalization Projects TBD

12	Project Name	Overall Program Administration	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Program Administration	
	Goals Supported / Needs Addressed	Program Administration / Effective Planning and Program Administration	
	Funding	CDBG: \$598,369 HOME: \$223,720.78 City of Madison: \$903,555 EHH (ESG / HPP / HAP): \$8,415 HCRI: \$51,500	
	Description	Provides staffing for the City's Community Development Program development, staffing of CDD Committees, contract development and monitoring and general program management; also provides support services including affirmative action, public information, historic preservation, administrative and bid services	
	Target Date	12/30/2025	
	Expected Beneficiaries	Not applicable; these are planning/administrative and fair housing activities. CDD anticipates that its CDBG Unit staff will administer or manage approximately 100 contracts during 2025.	
	Location Description	Citywide..	
	Planned Activities	Direct Administration and Support Services	FHC Fair Housing Services
13	Project Name	ESG26 Madison <i>[also see Project #5]</i>	
	Target Area	(See Appendices C and D.)	
	Objectives Supported	Services for Homeless and Special Needs Populations	
	Goals Supported / Needs Addressed	Homeless Services & Housing Stability / Affordable Housing	
	Funding	ESG: \$263,157 <i>(includes \$19,023 from ESG24 and \$64,394 from ESG25)</i>	
	Description	Improve housing stability for homeless	
	Target Date	12/30/2025	
	Expected Beneficiaries	Anticipated beneficiaries of activities funded within this Project are included in the figures reported under Project 5 (Homeless and Special Needs Populations) and are not listed here to prevent double counting. Actual numbers served by ESG-funded activities will be reported via HMIS (not via IDIS/eConPlan).	
	Location Description	Citywide.	
	Planned Activities	ESG26 Street Outreach, including: - CFC State Street Outreach & Mediation - MSM Housing-Focused Street Outreach ESG26 HMIS Services	ESG26 Rapid Re-Housing, including: - LSS Welcome Home Madison ESG26 Administration

Table 9 – Project Summary

AP-50 Geographic Distribution

24 CFR 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed.

The City of Madison, part of a dynamic and growing region, is the seat of both State of Wisconsin and Dane County government, and has more than 100 very active neighborhood, business and community organizations. Madison is also home to the University of Wisconsin, a nationally recognized research institution, known for a tradition of academic excellence. The City includes portions of three lakes, and is located upon an isthmus, which gives the City its defining geographical characteristics.

The City has chosen to describe its community development goals and objectives primarily in terms of the functional components of a well-developed community: providing affordable housing; expanding employment opportunities and enhancing neighborhood vitality by supporting new and existing businesses; and strengthening neighborhoods by providing opportunities that expand neighborhood cohesion and stability. The City has identified, within each goal, a geographic priority to stabilize or improve areas of high priority to the City, including Neighborhood Resource Team focus areas. These areas are comprised of neighborhoods with poverty.

The City also intends to prioritize and allocate a small portion of its funds annually (approximately 4% of CDBG entitlement funds) to activities that seek to improve neighborhoods and provide a low/moderate area (LMA) benefit. These efforts will focus on the Neighborhood Resources and Stabilization objective within the Plan.

The City's Neighborhood Revitalization Program targets neighborhoods with high concentrations of low- and moderate-income persons for a special planning and project development process. The CDBG Committee and Common Council select target neighborhoods for this process by analyzing census tract data, such as number of LMI individuals, race, ethnicity, age and housing tenure. The process involves a three-year period for each neighborhood, with the first year involving intensive work with a neighborhood association and a steering committee comprised of representatives of the area. This steering committee works closely with a CDBG-supported City planner to identify the neighborhood's needs and develop a neighborhood plan. The City's Planning Division and CDD are currently working with the Northeast Madison and Southeast Madison areas to develop the next two neighborhood plans.

Target Area	Percentage of Funds
<i>(See this section's narrative. Also see SP-10 narrative and Appendices C and D.)</i>	

Table 10 – Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City identifies, as target areas for investment, Census Tracts where 51% of the individuals meet HUD's low/moderate-income standards (80% or less of the area median income).

(Refer to www.cityofmadison.com/dpced/community-development/documents/targets_map.pdf for a map of census tracts identified by the City as target areas for the five-year period covered by the current Strategic Plan; see appendix C.)

The City also considers, as target areas for investment, any Neighborhood Resource Team (NRT) area with high concentrations of poverty.

(Refer to www.cityofmadison.com/mayor/nrt/ for a map of NRT areas identified by the City as high priority, as well as related information; see appendix D.)

AP-55 Affordable Housing

24 CFR 91.220(g)

One-Year Goals for the Number of Households to be Supported	
Homeless	12
Non-Homeless	297
Special-Needs	0
Total	309

Table 11 - One-Year Goals for Affordable Housing by Support Requirement

One-Year Goals for the Number of Households Supported Through	
Rental Assistance	12
The Production of New Units	85
Rehab of Existing Units	167
Acquisition of Existing Units	45
Total	309

Table 12 - One-Year Goals for Affordable Housing by Support Type

Actions planned during the next year to address the needs to public housing

The City's Community Development Authority (CDA) is in the process of a major redevelopment plan for an area of the City commonly known as the Triangle. This neighborhood is the City's largest public housing and Project-Based Section 8 housing site, currently containing over 300 combined units of public and Section 8 housing. Now that the community engagement and master plan are complete, the City will use it as a guide for the redevelopment of existing units, as well as the development of additional units under HUD guidance, potentially bringing hundreds of new mixed-income housing units to the site. The City is collectively leveraging its Affordable Housing Funds to support at least two CDA sponsored housing developments annually, one focused on preservation of units and another on new construction.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The CDD and CDA continue to work through implementation steps to engage with public housing residents interested in homeownership. Through the CDA's Self-Sufficiency program, and through the use of down payment assistance programs, some Section 8 Voucher holders have been able to transition to homeownership. In 2026, the CDD and CDA plan to create more educational opportunities for residents to learn about homeownership opportunities. The CDA is in the early stages of exploring additional homeownership options for residents of public housing, which may include other federal programs that can leverage ownership opportunities for residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

AP-65 Homeless and Other Special Needs Activities

The City of Madison is dedicated to preventing and ending homelessness in our community. As we set goals and prioritize activities within our homeless services, we are committed to addressing systemic racism, ensuring equitable access, and amplifying the voices of people of color and people with lived experience within the homelessness system.

Describe the jurisdiction's one-year goals and actions for:

- ***Reducing and ending homelessness, including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.***

To effectively support individuals experiencing homelessness — especially those who are unsheltered — it's crucial to reach out and assess their unique needs. Resources for those facing homelessness, particularly housing assistance, are often scarce. However, a well-designed Coordinated Entry (CE) system can significantly enhance access to and navigation of these resources. Implementing a trauma-informed assessment process at the right time will help individuals connect with appropriate services. The Dane County Continuum of Care (CoC) has recently revamped the CE system, with active involvement from the City of Madison, service providers, advocates, and, most importantly, individuals with lived experiences of homelessness. This new system, implemented in 2024, undergoes regular evaluations to ensure it meets community needs, focusing on ease of access and minimizing unnecessary assessments.

Additionally, multiple street outreach programs work to connect with individuals experiencing unsheltered homelessness living on the streets, in cars, or in other unsuitable conditions. To streamline these efforts, the Dane CoC has established a centralized Street Outreach Services (SOS) line with the HUD Unsheltered NOFO grant, which includes both a dedicated phone number and a webform. This allows unsheltered individuals to

refer themselves for services, or for concerned community members to share information about someone in need. Upon receiving a referral, the CoC Outreach Coordinator will assign it to the appropriate outreach program based on its target population and availability, utilizing the Homeless Management Information System (HMIS) for efficient coordination.

- ***Addressing the emergency shelter and rapid rehousing needs of homeless persons.***

Since the onset of the COVID-19 pandemic, the City has significantly enhanced its support for emergency shelter needs within the community. Before the pandemic, nonprofit agencies operated shelters in church basements and outdated school buildings, which lacked the capacity to accommodate necessary social distancing. In response, the City adapted by converting newly acquired properties and existing municipal facilities into temporary emergency shelters, creating safer environments for those in need.

In partnership with the Dane County, the City is developing Madison's first purpose-built shelter for individuals identifying as male, with an expected opening in 2025. This initiative reflects our commitment to providing dedicated, supportive spaces for vulnerable populations.

The City will continue to support family shelters and shelters for single women, collaborating with all shelter providers to enhance safety, reduce barriers to access, and improve housing outcomes. Our performance measures for these shelters include tracking the number of households served, the average length of stay, and the rate of exits to permanent housing solutions.

- ***Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.***

The City believes that housing is the solution to homelessness and is committed to assisting people experiencing homelessness—especially chronically homeless individuals, families with children, veterans and their families, and unaccompanied youth—in transitioning to permanent housing and independent living. Our goal is to shorten the duration of homelessness, facilitate access to affordable housing, and prevent recent transitions from homelessness back into it.

To achieve this, the City will continue investing in effective housing solutions, including Rapid Rehousing (RRH), Permanent Supportive Housing (PSH), and other permanent housing programs. These initiatives are designed to quickly move households who are not likely to be able to find housing on their own out of homelessness and into stable, permanent housing.

Our revamped Coordinated Entry system will streamline the process by reducing unnecessary assessments and reallocating staff resources toward housing search and placement, ensuring quicker access to housing.

The City will actively monitor key performance indicators, including the length of time from Coordinated Entry referral to housing move-in dates and the rate of return to homelessness at 6, 12, and 24 months.

- ***Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.***

In order to reduce the inflow into the homeless services system, we must work with other systems of care such as health, mental health, foster care, and criminal legal institutions. The City works with the Dane CoC's Core Committee in developing and maintaining ongoing relationships with those systems and creating opportunities to meaningfully collaborate. The CoC is planning to review the discharge planning with those entities and provide up to date information about homeless services.

In addition, the City and CoC partners work closely with the employment, education, and other social services agencies.

To help low-income individuals and families—particularly those with extremely low incomes—avoid homelessness, the City is focused on addressing the needs of those being discharged from publicly funded institutions and systems of care, such as healthcare facilities, mental health facilities, foster care, and correctional programs. We also aim to support individuals receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

To reduce the inflow into the homeless services system, the City collaborates with various care systems, including health, mental health, foster care, and the criminal justice system. We actively participate in the Dane County Continuum of Care (CoC) Core Committee to foster ongoing relationships with these systems and create meaningful collaboration opportunities and participate in the State's Interagency Council.

The CoC is currently reviewing discharge planning processes with these entities to ensure that they are equipped with up-to-date information about available homeless services.

Additionally, the City and CoC partners maintain close ties with employment, education, and other social service agencies to create a comprehensive support network for those at risk of homelessness. Through these coordinated efforts, we aim to build a stronger safety net that prevents individuals and families from falling into homelessness.

AP-75 Barriers to Affordable Housing

24 CFR 91.220(j)

The cost of developing, maintaining and improving affordable housing in the City of Madison is affected by several key factors. Among the most important of these are the time it takes developers to take a project from start to finish; the clarity and ease of use of zoning codes; and property tax policies. The City has identified these as barriers to affordable housing, and continues to proactively implement strategies to remove their negative effects.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City has a policy that exempts developers of affordable housing from the normally required park impact fees. This policy has already begun to produce significant cost savings for affordable housing projects, thus helping to facilitate their development. In 2026, City Community Development Division staff will continue to work closely with other key City departments to ensure successful implementation of the park fee waiver policy.

Because the City zoning code is one of the primary tools used to regulate development, staff from the City's Department of Planning and Community & Economic Development (DPCED) actively monitors its use. Careful attention is paid to address any issues that may impact the development of affordable housing.

Due to concerns that the code was sometimes confusing and especially challenging for developers to navigate, the City undertook, and completed in 2013, a major rewrite of its zoning code (Chapter 28, Madison General Ordinances). The

result was a much-improved code that is easier for affordable housing developers to use and understand. The previous code was originally adopted in 1966. Until the new code was adopted, nearly every housing project — whether market-rate or affordable — required a rezoning to a unique Planned Development District in order to accommodate it.

Through its updated zoning code, the City now allows several additional housing types that it believes will encourage the development of additional affordable housing units:

- The updated comprehensive plan and newly adopted areas plans recommend greater or expanded density across most residential and mixed-use zoning districts throughout the City.
- Accessory dwelling units (ADUs, sometimes called "granny flats") are now allowable as a permitted use on up to 8-unit lots, which can provide new small-scale affordable housing opportunities.
- Cooperative housing is more broadly allowed.
- In some zoning districts, housing projects with up to eight units are allowable as a permitted use. Under the previous code, any building with over two units required conditional use review. This was often onerous for small-scale projects or conversions.
- In many zoning districts, the code allows for (and encourages) residential units in mixed-use buildings. Previously, this was allowable only with unique Planned Development zoning.

Since 2021, the Plan Commission has been entertaining discussions about another revision to the zoning code that would expand the definition of what is considered a "permitted use" in certain residential and mixed-use zones, the goal of which is to further lower barriers to developers of low-income housing by reducing costs associated with applying for conditional use permits, while also decreasing the amount of time spent pursuing additional land use approvals.

Discussion

The City's DPCED has established (and continues to work to refine) a Development Services Center (DSC) model that provides a central location for information on development, review, permitting and inspection processes for all City agencies. Under this model, department staff works to streamline the development process with the goal of improving timeliness, thus reducing developer costs associated with developing a variety of projects including affordable housing. Department staff leads weekly Development Assistance Team meetings that include staff from an array of stakeholder agencies, with a focus on proactive problem solving and guidance to developers as projects move forward. The Community Development Division staff will participate in these weekly meetings whenever its issues or projects are the subject of discussion. The Division will also continue to review and evaluate its efforts to fund affordable housing, and where possible, seek Council action to remove non-financial obstacles to the construction of affordable housing within the City.

Property tax exemption is another issue that impacts the ability to develop affordable housing. With the implementation of relatively recent State legislation, property owned by nonprofit benevolent associations can be developed as low-income housing and be exempt from local property taxes. Without this provision, owners of these kinds of low-income housing projects would pay property tax, resulting in increased expenses that would almost certainly be passed on to tenants in the form of higher rents.

Community Development Division staff will continue to meet periodically with Third Sector Housing, a group of nonprofit housing development agencies. An important goal of these meetings will be to enhance coordination and collaboration associated with the development of affordable housing. The CDD will work with Third Sector representatives to identify ways to improve the capacity of nonprofit housing development organizations and streamline the City's funding and contracting processes.

In addition to the efforts listed above, **Appendix B** lists specific additional work that will be taken to alleviate impediments to fair housing in 2026.

Proposed actions associated with the City's 2026 Action Plan are described primarily in the specific related sections of the Plan. In addition to descriptions found in those sections, the following actions are planned for 2025.

Any other actions planned to:

- ***Address obstacles to meeting underserved needs***

In 2026, the City of Madison will continue to focus on the following three primary areas as it addresses obstacles to meeting underserved needs: (1) affordable housing; (2) economic development and employment; and (3) strong and healthy neighborhoods.

The obstacles to meeting **housing needs** in the City of Madison revolve primarily around the high cost of housing and need for additional affordable housing. While housing quality, race and non-housing factors play a role in the city's housing needs, housing cost burden is by far the leading challenge in the market. Moreover, the limited supply and rising cost of housing makes challenges like homelessness and racial inequity in housing even more difficult to address. Begun in 2025, and continuing through the remainder of the 2024-2029 Consolidated Plan, the City intends to prioritize homeless services and housing stability as the primary focus of its annual CDBG funds for Public Services.

The obstacles related to **economic development and employment needs** specifically targeted by the City of Madison relate most often to the need to enhance neighborhood vitality. In 2026, this need will continue to be addressed through support for employment opportunities for low- and moderate-income people, as well as support for new and existing micro-enterprises and small businesses. Most of the City's support in this goal area will go to community-based nonprofit organizations that support job creation and community business development, as well as those that support small business development through assistance to entrepreneurs.

Neighborhood needs associated with the City's 2026 Action Plan relate primarily to strengthening and enhancing the health of neighborhoods with a focus on support for low- and moderate-income persons. Needs will continue to be addressed through support for strategic investments in community assets and amenities, as well as other planning and revitalization efforts. Neighborhood plans in low- to moderate-income neighborhoods and improvements to community facilities and other assets in those neighborhoods will be the City's highest priority in this area for 2026.

- ***Foster and maintain affordable housing***

Among the strategies the City of Madison will continue to use in 2026 to foster and maintain affordable housing are the following:

- For new multifamily developments pursuing Section 42 tax credits, align City funding programs to maximize the likelihood of tax credits being awarded. Coordinating these programs leverages City subsidy, making subsidy go farther or reach deeper down the income spectrum.
- Coordinate funding timelines to maximize opportunities for projects to have City awards in place in time for the December Section 42 tax credits deadline.
- Coordinate funding award criteria and processes so that projects that meet a common set of criteria that is in-line with City and WHEDA priorities (access to transportation, number of 3-bedroom units, walkability, etc.) get funded by the City and therefore score higher on their tax credit applications.
- Actively recruit developers to apply for Section 42 tax credits in the City of Madison.

- Provide financing to demonstration projects to test the viability of alternative housing forms (Accessory Dwelling Units, Micro Housing, Cottage Housing, Condominiums, Cohousing, etc.).
- Consider exceptions to existing funding programs and zoning rules to allow for demonstration projects.

- ***Reduce lead-based paint hazards***

The City will continue to work to reduce lead-based paint hazards by requiring subrecipients and developers to comply with the lead-based paint requirements set forth in 24 CFR Part 35. These include meeting requirements for notification, identification and stabilization of deteriorated paint; identification and control of lead-based paint hazards; and identification and abatement of lead-based paint hazards. The *Protect Your Family from Lead in Your Home* pamphlet, developed by the EPA, HUD and the U.S. Consumer Product Safety Commission, will be distributed. The City-administered down payment assistance programs will also be required to comply with the lead-based paint requirements.

The City and County Board of Health's Environmental Health Division will continue to provide community education programs related to lead-based paint hazards. Information about lead is currently incorporated into the nutritional counseling conducted at the WIC (Women, Infants and Children) Clinics held throughout the City and County. Evaluation of homes of children found to have elevated blood lead levels, as well as consultation for renovation and remodeling, are provided through this program. The City-County Public Health Department and City Building Inspection staff will continue to coordinate implementation of a local ordinance designed to reduce lead paint removal and dust hazards to neighbors.

Division staff will also continue to educate realtors and lenders that utilize mortgage reduction assistance about the dangers of lead paint in City of Madison housing stock. Lead-based paint remediation policies and procedures are included in each housing development contract provided through the Division. Contractors are required to follow Division Rehabilitation Standards, which include local, state and federal requirements on the proper implementation of lead-based paint mitigation. The City will also continue to allow a higher per-unit subsidy for rehabilitation projects that involve lead paint reduction, due to the increased costs of mitigation.

- ***Reduce the number of poverty-level families***

To reduce the number of poverty-level families in Madison, the City will continue to support the availability and accessibility of employment, education, transportation, health care and family support services to low- and moderate-income households. In each case, the focus will be help individuals and families attain greater independence and promote neighborhood involvement.

The City will also continue to implement the following major strategies to achieve the goal of reducing family poverty:

1. Market information about resources to poverty-level households;
2. Refine housing assistance programs to better link housing assistance with related resources, such as neighborhood centers and employment resources;
3. Improve City service delivery systems so that they are more responsive to neighborhoods where poverty-level families reside in greater numbers, and encourage goals, policies and practices that involve these neighborhoods in City's decision-making processes and revitalization efforts;
4. Increase the quantity of safe, quality, affordable rental housing throughout the City—particularly in locations that are well served by transit and are proximate to places of employment, schools, parks, health care and other basic amenities;

5. Increase economic development and employment and training opportunities; and,
6. Improve collaboration between local governments, nonprofits, schools and businesses.

In addition, the City will continue its poverty reduction strategies and efforts in geographically defined Neighborhood Resource Team (NRT) areas. This work will include working more closely with residents, owners and community groups to address emerging issues and needs and bringing additional services and opportunities to residents who may have been previously underserved or isolated. Key NRT strategies include those listed below.

- Improve public infrastructure within target areas.
- Support NRTs, which include representatives from Civil Rights, Building Inspection, Public Health, Police, Community Development Division, Fire and Parks, in each of the designated NRT areas.
- Increase effectiveness of law enforcement efforts to reduce criminal activity.
- Stabilize the management of rental housing in transitioning and challenged neighborhoods.
- Support efforts of owners and residents to reduce energy consumption.
- Assess and refine the City's efforts to support resident involvement and empowerment in the community.
- Coordinate City-funded programs and services with other funders, agencies, businesses and neighborhood organizations.

- ***Develop institutional structure***

In its efforts to develop institutional structure during 2026, the City of Madison will continue to undertake the following activities:

- Participate in the City's Performance Excellence/Results Madison Initiatives. The key element of these Initiatives is to create outcome-based budgeting, streamline City services and create transparency for City residents.
- Support and coordinate with the Dane County Continuum of Care (CoC) to help ensure the best possible system of supports for people who are homeless or at risk of homelessness. The addition of a full-time CoC Coordinator located in a CDD office has allowed this coordination to be simpler and more effective.
- Consider roles and responsibilities within the Division's various lending programs and continue to work toward developing a revised system structure that best addresses stated goals and objectives.
- Implement revised internal Division outcome reporting structures to optimize efficiency and accuracy associated with annual performance reporting.
- Review internal and external policies and procedures and create technical assistance trainings for subrecipients.

- ***Enhance coordination between public and private housing and social service agencies***

The City of Madison will continue its ongoing efforts to increase coordination and collaboration with and between public and private housing and social service agencies engaged in related activities, especially where there are clear opportunities to enhance local initiatives. The City's Community Development Division will work with local service providers, public and private housing organizations, businesses, labor union representatives, City of Madison departments, Dane County, the State of Wisconsin and other funders to more effectively deliver the City of Madison's community development program.

Historically, the City's community development program has been used primarily to fund nonprofit agencies that provide direct services to City of Madison residents. Over the five years covered by the current 2025-2029 Consolidated Plan, the CDBG Committee is continuing that emphasis, but will also consider the role that for-profit businesses might play in achieving stated goals and objectives, especially in its affordable housing goal area.

AP-90 Program Specific Requirements24 CFR 91.220(l)(1,2,4)

The City uses CDBG program funds to ensure decent affordable housing, to provide services to the most vulnerable in our communities, to create jobs through the expansion and retention of businesses and to support strong and healthy neighborhoods. A minimum of 70 percent of CDBG funds are used for activities that benefit low- and moderate-income persons, and each funded activity meets at least one of the following national CDBG objectives:

- to benefit low- and moderate-income persons;
- to prevent or eliminate slums or blight; or,
- to address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, for which other funding is not available.

Community Development Block Grant Program (CDBG)Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1.	<i>The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed</i>	\$ 404,849
2.	<i>The amount of proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.</i>	\$ 0
3.	<i>The amount of surplus funds from urban renewal settlements</i>	\$ 0
4.	<i>The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan</i>	\$ 0
5.	<i>The amount of income from float-funded activities</i>	\$ 0
	Total Program Income:	\$ 404,849

Other CDBG Requirements

1.	<i>The amount of urgent need activities</i>	\$ 0
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HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. *A description of other forms of investment being used beyond those identified in Section 24 CFR 92.205 is as follows:*

Not applicable.

2. *A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 24 CFR 92.254, is as follows:*

The Community Development Division will use recapture provisions for all assistance provided as direct subsidies allowable in homebuyer activities per 92.254. Direct subsidies will be provided in the form of a 0% interest-bearing loan with shared appreciation due upon the sale, transfer of title or the unit no longer remaining owner-occupied. CDD will recoup the amount invested in the property, plus shared appreciation. The recapture amount is based on the net proceeds available from the sale, rather than the entire amount of the HOME investment. "Net proceeds" is defined as the sales price, minus superior loan repayment and any closing costs incurred by the borrower(s). CDD will record with the Register of Deeds a mortgage and a written agreement with the City of Madison to enforce the recapture provisions and period of affordability requirements of 92.254 on each property.

3. *A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds [see 24 CFR 92.254(a)(4)] are as follows:*

The City of Madison will implement HUD-required recapture provisions per Notice CPD 12-003 to recoup all or a portion of the assistance provided to homebuyers, if housing funded at least in part with City-administered HOME funds does not continue to be the principal residence of the family for the duration of the period of affordability. When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit and the net proceeds are not sufficient to recapture the full HOME investment, then the City of Madison will recapture the net proceeds (if any). Recapture will be implemented in conformance with 24 CFR 92.25(a)(4) to ensure the affordability of units acquired with HOME funds. The City's loan portfolio is reviewed annually to determine whether each home remains the borrower's primary residence. This process is undertaken using tax assessment information and through verification sent by U.S. Postal Service requesting that households complete and return a survey that is reviewed by City staff.

CDD's full Recapture Policy is attached as **Appendix F**.

4. *Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:*

The CDD does not plan to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

5. *If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).*

Not applicable.

6. *If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).*

Not applicable.

7. *If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).*

Not applicable.

Emergency Solutions Grant (ESG)

Reference 24 CFR 91.220(l)(4)

1. *Include written standards for providing ESG assistance. (May include as attachment.)*

See **Appendix E1**, *City of Madison ESG Policies and Procedures Manual* and **Appendix E2**, *Dane County Written Standards*.

2. *If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.*

The Dane CoC is responsible for operating and overseeing a Coordinated Entry (CE) system, which is supported by the City of Madison through matching funds and participation in system design and evaluation processes. In addition, a City staff member has been co-chairing the Reimagine CE workgroup since 2022, which plans to launch new assessment and prioritization systems in the fourth quarter of 2024. The current CE system descriptions follow.

Access:

The Institute for Community Alliances (ICA) is the lead agency for the Dane CoC Coordinated Entry (CE) system. ICA receives the CoC's CE grant and establishes subcontracts or Memorandum of Understandings with other agencies that serve as access points for the CE system. Individuals seeking assistance through the Dane CoC CE can access services through several access points, including:

- The Tenant Resource Center for prevention resources.
- Emergency shelters such as The Salvation Army Women Shelter and Family shelter, Porchlight Men's shelter, The Beacon Day Resource Center, and Domestic Abuse Intervention Services.
- Street outreach programs that serve as mobile CE hubs.
- The Coordinated Entry office located at The Beacon Day Resource Center.
- The Coordinated Entry phone line.
- The CE contact form available on the Dane CoC website.

Assessment:

- Individuals seeking assistance through the coordinated entry system must have experienced literal homelessness for at least 7 days.
- The Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) is used as the assessment tool for single adults, households with children, and transition age youth (ages 18-24).
- Formal diversion is provided by TSA (The Salvation Army) for single women and families.
- Assessors follow up with individuals every 30-45 days to assess their current need and update information.

Prioritization:

- Individuals must be experiencing Category 1 (Literally Homeless) or Category 4 (Fleeing Domestic Violence) as defined by HUD to be prioritized for assistance.
- There is a priority list for single adults and for households with minor children.

- Individuals are prioritized based on their chronic homeless status, length of time homeless (capped at 36 months), and VI-SPDAT score.
- Permanent Supportive Housing (PSH) serves individuals whose situation meets the chronic definition, have been homeless the longest, and have the highest VI-SPDAT score.
- Rapid Re-housing (RRH) serves individuals whose situation has not yet met the chronic definition.

Individuals may receive a lesser intervention than their score suggests based on available resources and other factors.

3. *Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).*

Emergency Solutions Grant (ESG) funds are combined with other federal (HOME and CDBG) and City funds as part of the homeless service-focused funding Request for Proposals (RFP) processes. After reviewing proposals and receiving feedback from the public, funding recommendations are made at the CDBG Committee and submitted to the Common Council for approval, as part of the annual operating budget process. Funded agencies then enter into contracts with the City and start providing housing/services at the beginning of the following calendar year. During 2021, a homeless services funding RFP process was held to determine the use of 2022-2025 homeless service resources. The next homeless services funding RFP process will take place during 2025 to determine the use of those resources for 2026-2029.

4. *If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.*

To ensure homeless individuals' voices are heard, Madison's Dane CoC has established a Lived Experience Council (LEC), which consists of people with personal experience of homelessness. The LEC advises the CoC Board on significant policy matters and participates in the funding process, such as serving as review team members for the State ESG. Additionally, Madison's CoC Youth Action Board (YAB) has participation from youth with lived experience and advises the board on youth-related policy matters and participates in funding review processes. Furthermore, the CoC has designated seats for appointed members of the LEC and YAB on the board. The City of Madison actively engages LEC and YAB to inform the City's policies and program designs funded with ESG.

The City of Madison also invites currently and formerly homeless individuals and families to provide feedback and participate in city planning and evaluation activities. We do this by organizing specific listening sessions or focus groups to hear their feedback for planning and evaluation purposes. In addition, the City-County Homeless Issues Committee (CCHIC) provides feedback to the City of Madison. Committee structure requires that two members are homeless or formerly homeless individuals. Overall, the City of Madison's approach ensures that people with lived experience of homelessness have meaningful input in decision-making processes that affect them, as required by 24 CFR 576.405(a).

5. *Describe performance standards for evaluating ESG.*

The CoC created a list of criteria for evaluating both ESG- and CoC-funded programs. Each agency's performance on a specific outcome is awarded a point value, determined by the CoC's Board of Directors, outside of a specific funding process. The points are totaled, and agency programs are ranked from highest to lowest. The agency is only ranked on those criteria that are applicable to its program. The score is a percentage of the number of possible points and is used by the agencies to determine which programs are funded.

The following criteria are used specifically for proposals seeking ESG funds:

- Agency is on course to spend 100% of its awarded funds by the end of the contract;

- Agency meets the HMIS data quality standards;
- Agency submits requested reports to the City in a timely manner;
- Agency meets percentage goal for participants who remain or leave for stable housing;
- Agency meets percentage goal for participants who did not enter shelter within 12 months;
- Agency meets percentage goal for participants who maintain housing at six months; and
- Agency meets percentage goal for unsheltered participants who move into housing.

DRAFT

APPENDICES

2025-2029 City of Madison CITIZEN PARTICIPATION PLAN

PURPOSE

The City of Madison's Community Development Division welcomes the participation of Madison citizens in the development, implementation, and evaluation of its HUD-funded Community Development Program ("Program"). The goal of this Plan is to outline the opportunities for Madison residents, especially low- and moderate-income residents; residents living in low- and moderate- income neighborhoods or participating institutions; businesses; and community organizations to help shape the activities of the Program. This Plan is in conformance with Section 103(a)(3) of the Housing and Community Development Act of 1974 and 24 CFR 91.105, which are the federal regulations governing citizen participation in the Consolidated Planning process. This Plan provides for and encourages public participation in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, and the annual performance report (CAPER).

The Community Development Division ("CDD"), through its CDBG Unit, will have lead responsibility for developing and implementing the Consolidated Plan. Policy oversight will be the responsibility of the Madison Community Development Block Grant (CDBG) Committee, which is composed of two alders and seven appointed citizen members.

Since 1986, the City of Madison has actively sought the involvement of Madison citizens in its community needs assessment and planning. Community Development staff have analyzed information, trends, citizen survey and focus group responses, and input from public hearings to develop recommendations for each area. As the program progressed, the City included more public funding bodies in the process to develop a more comprehensive look at community needs. While still adhering to this comprehensive approach, CDD also uses real-time data gathered through its operation of publicly funded projects.

While the structure of CDD allows for ongoing participation of residents and groups, the Citizen Participation Plan applies to six areas that CDD's CDBG Unit oversees:

- (1) CDBG Committee meetings and regular public hearings;
- (2) the Five-Year Consolidated (Strategic) Plan;
- (3) the One-Year Annual Action Plan;
- (4) substantial amendments to the Consolidated and/or Action Plans;
- (5) the Consolidated Annual Performance and Evaluation Report (CAPER); and
- (6) amendments to the Citizen Participation Plan itself.

HUD requires that citizens have an opportunity to review and comment on the development and drafts of the aforementioned documents to allocate funding to the jurisdiction. This document outlines how Madison residents may participate in these six key areas.

CITIZEN PARTICIPATION PLAN

CDBG Committee Meetings and Public Hearings

The City has a nine-member CDBG Committee that is comprised of citizens and elected officials. The Committee discusses ongoing issues of the Program's operations, recommends funding for projects and oversees the development of all HUD projects funded through the City of Madison. Additionally, the Committee provides an

opportunity for continuous citizen and organizational participation through regular meetings and public hearings.

The Committee holds at least one meeting each month, as long as there is at least one item on the agenda and quorum is met. All Committee meetings are publicly-noticed open meetings, and are operated in a manner that permits citizen comments. These meetings follow the public meeting notice requirements outlined under the "Notifications" section of this document. The Committee maintains written and public minutes of its meetings, including associated documents such as reports or proposals, which are publicly accessible via the City's Legislative Information System (Legistar).

In addition to its monthly meetings, the Committee holds a minimum of two public hearings each year.

Generally, the hearings are held to obtain citizens' views on housing and community development needs, development of proposed activities, and review of program performance. However, the agenda for the hearings may be specifically targeted if it is a funding or consolidated planning year. The first hearing is typically held in late summer and the second hearing in late fall, although this may be subject to change based on the scheduling of other decision-making bodies' meetings, including those of the Finance Committee and Common Council. The hearings follow the requirements outlined in the "Notifications" section of this document.

CDD staff participate in community-based meetings and task forces to continuously explore and obtain feedback on issues involved in implementing a sound community development program. Staff, as well as some Committee members, are involved in such meetings with the Homeless Services Consortium of Dane County, the Third Sector Group, Home Buyers Round Table of Dane County, Neighborhood Resource Teams, and ad hoc groups like the Housing Strategy Committee. These meetings serve as important sources of information about working with members of the target population.

Development of the Five-Year Consolidated (Strategic) Plan

The Consolidated Plan is developed through a collaborative process to establish a longer-term vision for Madison's community development goals and objectives. Participation from citizens, community agencies and other interested stakeholders is an important part of the process. Individual consultations, public meetings and hearings, occasional public surveys and written comments are incorporated into the participation strategy. CDD staff make a special effort to reach out to the citizens residing in CDBG-funded or targeted neighborhoods for their ongoing input into the Consolidated Plan. Additionally, CDD encourages the participation of all residents, including Persons of Color, Limited English Proficiency populations, and persons with a disability. This section outlines the steps for public participation in the Five-Year Consolidated Plan.

Individual Consultations

Before drafting the Five-Year Plan, the City receives input from various community institutions. Many of these agencies have continuous and frequent contact with CDD, the Program and Committee. However, during the spring and summer, CDD staff meets with public and private, non-profit and for-profit agencies and community organizations to specifically discuss the Five-Year Plan. These consultations may be through individual meetings, task force or neighborhood meetings, or other means. The purpose is to gain input and data that will guide the development of the goals and objectives articulated in the Five-Year Plan.

Citizen Input: Public Hearings and 30-Day Comment Period

Citizens are encouraged to provide input into the Five-Year Plan through public hearings and the comment period. In addition to an opportunity to indicate community needs that should be reflected in the objectives of the Plan, citizens may comment on the draft Plan before it is finalized. Any comments received through public hearings or the comment period will be recorded, summarized and addressed in the final Plan.

Public Hearings: CDD holds at least two public hearings to provide an opportunity for input by Madison residents, especially residents living in low-income or in targeted neighborhoods, to the Five-Year Plan. The first hearing is held to gather information on community needs from citizens. The second hearing is to receive oral comments on the draft Consolidated Plan, prepared by CDD staff. The public hearing is advertised to citizens following the requirements outlined in the "Notifications" section of this document. The publication includes an executive summary of the Consolidated Plan that includes the contents and purpose of the Plan.

Comment Period: Citizens are given a 30-day period to submit comments on the draft Plan. The comment period starts when the draft is published, two weeks before the public hearing. It is available to citizens at various locations, including public libraries, specified neighborhood centers, the CDD website and office, along with other public gathering spots. Notification of the draft Plan and the designated locations will be published in the main newspaper and circulated electronically to numerous stakeholders and agencies that specifically seek to support Persons of Color, special needs, or targeted neighborhood populations. Additionally, CDD will provide, upon request, a reasonable number of free copies of the Plan to citizens and interested stakeholders.

Final Consolidated Plan

The Plan includes a summary of all written and oral testimony that will be considered in the final Consolidated Plan. Additionally, the Plan will provide reasons for any comments or views not accepted. The final Plan is reviewed and approved by the City's CDBG Committee, Finance Committee and Common Council. The Plan is submitted to HUD no later than 45 days after HUD announces formula grant allocation figures for Year 1 of the period covered by the Plan.

One-Year Annual Action Plan

Each year, an Annual Action Plan (AAP) and a Consolidated Annual Performance & Evaluation Report (CAPER) are submitted to HUD. The AAP outlines the funding allocations that will be used to achieve the objectives outlined in the Consolidated Plan. During the development of the AAP for the City of Madison, there is a public hearing held in conjunction with a CDBG Committee meeting. The public hearing follows the publication requirements outlined in the "Notifications" section of this document. In addition to the public hearing, the AAP is published for at least 30 days for written public comment. The final AAP is approved by the City's CDBG Committee, Finance Committee and Common Council, and is subsequently submitted to HUD no later than 45 days after HUD announces formula grant allocation figures for the program year covered by the AAP.

Substantial Amendments

The Citizen Participation Plan allows for substantial amendments to the AAP and/or Five-Year Consolidated Plan. Per federal regulations, the triggering criteria for a substantial amendment is determined by the local grantee. For the City of Madison, unless one is explicitly required or requested by HUD for another purpose, a substantial amendment only applies to the changes in the City's use of CDBG funds, from one eligible activity to another. More specifically, a substantial amendment is locally triggered by:

"Any change in the allocation or distribution of funds, activity or recipient, and the dollar amount of that change is equal to or greater than 25% of the current fiscal year federal allocation."

If there is a proposed substantial amendment to the Consolidated Plan or Action Plan, CDD staff will draft the amendment. A brief summary of the change will be published, identifying where the full document can be reviewed. Once noticed, the public may review the document for at least 30 days and provide written comment to the CDD office. During the 30-day comment period, a public hearing will be held at a CDBG Committee meeting to allow for oral citizen input. The hearing will follow the requirements outlined in the "Notifications"

section of this document. The 30-day comment period requirement may be waived or modified by HUD in certain cases when warranted, such as for special allocations of supplemental emergency grant funds.

The final amendment includes a summary of and response to all citizen comments that were received. The amendment must be approved by the City's CDBG Committee, Finance Committee and Common Council.

Consolidated Annual Performance and Evaluation Report (CAPER)

CDD encourages citizen participation and input in the Consolidated Annual Performance and Evaluation Report (CAPER). There is one public hearing on the CAPER held near the time of its submission by the City. The meeting is publicly noticed, held as part of a regularly scheduled CDBG Committee meeting, and encourages citizen comment about the Program. The hearing follows the requirements outlined in the "Notifications" section of this document.

The draft CAPER is published for at least 15 days to receive comments on the performance report before it is submitted to HUD. The final report includes a summary of and response to all citizen comments received orally or in writing. Notification of the draft CAPER will be circulated electronically to numerous stakeholders and agencies that specifically seek to support Persons of Color, special needs, or targeted neighborhood populations. The draft is available to citizens at the CDD website and disseminated through various channels including our email lists.

The final CAPER is approved by the City's CDBG Committee, Finance Committee and Common Council before it is submitted to HUD.

Substantial Amendments to the Citizen Participation Plan

If changes to the Citizen Participation Plan are necessary, the changes will be drafted by CDD staff and reviewed by the CDBG Committee. The CDBG Committee meeting held to review the changes will incorporate a public hearing to afford citizens the opportunity for oral comment. This meeting will follow the procedure outlined in the "Notifications" section of this document. After reasonable notice, the draft will also be available to the public for a minimum of 30 days for written comment. The updated Citizen Participation Plan considers all the written or oral comments received before it is adopted.

GENERAL REQUIREMENTS

Public Hearings

At least two (2) public hearings are held each year to obtain feedback and input from Madison citizens, public agencies, and other interested parties on the housing and community development needs for the City. Generally, one public hearing is held in the first quarter of the year. All public hearings before the CDBG Committee or other appropriate organizations or groups are advertised as outlined in the "Notifications" section below.

Public Meetings

All CDBG Committee and Subcommittee meetings are public and open meetings. Any open meetings must meet the requirements outlined in the "Notifications" section of this document.

Notifications

Advance notice of all public meetings and hearings is provided to residents in compliance with governing regulations.

Public notice of **open meetings** shall be given at least 24 hours prior notice and set forth the time, date, place and subject matter of the meeting as required by Madison General Ordinances. The notice, agenda and minutes of all open meetings are submitted to the City Clerk and posted on the City website. Additionally, citizens may obtain specific information pertaining to federally assisted housing and community development programs on the CDD website.

At least two weeks' notice is provided for any **public hearing**, as required by HUD. Notice is provided by posting on the City website through the City Clerk. Citizens may also view this information on the CDD website.

In addition to posting on the City website, citizens receive additional notice for public hearings related to the Consolidated Plan, Action Plan or substantial amendments. Advertisements are published in local newspapers for general circulation, and appear in English, Spanish and/or Hmong, if more appropriate. These advertisements appear for at least two weeks prior to any public hearing or comment period. The advertisements include a notice of the hearing, a summary of the relevant documents to be discussed, the process for public comment and a list of locations where relevant documents may be reviewed.

Accommodation

All public meetings and hearings are held in locations that are accessible to persons with disabilities. Upon request, translation for non-English speaking residents and/or those who are hearing impaired will be provided. These or other provisions necessary to accommodate residents may be available if requested at least five business days prior to a public hearing or meeting.

Document Access

Upon request, copies of all Plan documents are available to the public. The Consolidated Plan, Action Plan, CAPER, Citizen Participation Plan and other documents are posted on the CDD website. The public has the opportunity to review these documents while in draft form to incorporate citizen comments and contribute feedback to the final document. Citizens may also contact the CDD office to obtain a paper copy of any document made electronically available through the website. Upon request, the documents may be obtained in a form accessible to persons with disabilities.

Access to Records

Upon request, citizens, public agencies, and other interested parties will be provided reasonable and timely access to information and records relating to the Consolidated Plan, Citizen Participation Plan, performance reports, and the City's use of federal assistance awarded under grant programs.

Technical Assistance

Technical assistance may be provided to neighborhoods targeted by CDBG funds or other low-income areas that need assistance preparing funding proposals or participating in the consolidated planning process. Assistance may be limited to the extent that staff or other resources are available, or if prohibited by federal, State, County or City rules or regulations. This provision does not involve the use of City equipment, reassignment of City staff to the proposed group or project, or guarantee an award of funds.

Complaints

CDD staff is responsible for receiving and responding in writing to citizen complaints regarding any HUD-funded program or activity, including Consolidated Plan activities. Staff will provide a substantive, written response to the complainant within 15 business days, where practicable. If the response cannot be prepared within 15 business days, the complainant will be notified of the delay and the approximate date that the response will be provided.

Complaints should be addressed to:

City of Madison Community Development Division

Suite 300, Madison Municipal Building

215 Martin Luther King, Jr. Boulevard / PO Box 2627

Madison, Wisconsin 53701-2627

cdbg@cityofmadison.com

The following table lists the agencies consulted during the development of the 2025-2029 Consolidated Plan.

Describe agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

1	Agency/Group/Organization	Public Health Madison & Dane County
	Agency/Group/Organization Type	Health Agency Other Government - Local
	What section of the Plan was addressed by Consultation?	Lead-Based Paint Strategy Anti-Poverty Strategy Non-Housing Community Development Strategy Non-Homeless Special Needs Assessment
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Met to discuss data and the characteristics of non-homeless special needs populations and the housing and support services needed to serve the populations. Will forward Consolidated Plan to agency to continue discussion for improved performance.
2	Agency/Group/Organization	African Center for Community Development
	Agency/Group/Organization Type	Civic Leaders Services – Employment Services – Education Services - Youth Housing
	What section of the Plan was addressed by Consultation?	Anti-Poverty Strategy Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency 09/06/2024 to collect comments on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.
3	Agency/Group/Organization	Neighborhood Center Directors
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with 15 directors of City-funded neighborhood centers on 4/22/24 to advertise the Consolidated Plan Survey and to collect their comments on needs, trends and priorities for the City of Madison. City staff continue to meet with the center directors quarterly.

4	Agency/Group/Organization	City of Madison Department of Civil Rights
	Agency/Group/Organization Type	Services - Employment Services - Fair Housing Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Anti-Poverty Strategy Non-Housing Community Development Strategy Non-Homeless Special Needs Assessment
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Met with Community Connectors to discuss Citizen Participation Plan for Chinese-, Hmong-, and Spanish-speaking communities. Lastly, met with Disability Rights Coordinator to discuss needs of residents of the City of Madison who have disabilities. Will forward Consolidated Plan to agency to continue discussion for improved performance.
5	Agency/Group/Organization	MadREP – BizReady Program
	Agency/Group/Organization Type	Civic Leaders Services – Business Development
	What section of the Plan was addressed by Consultation?	Anti-Poverty Strategy Non-Housing Community Development Assets
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency 9/23/24 to collect comments on needs, trends and priorities for City of Madison microenterprises and small businesses. Will forward Consolidated Plan to agency to continue discussion for improved performance.
6	Agency/Group/Organization	Madison/Dane County Continuum of Care
	Agency/Group/Organization Type	Housing Services - Homeless Other Government - Local Planning Organization
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Anti-Poverty Strategy Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of numerous group consultations to collect comments on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.

7	Agency/Group/Organization	City of Madison Economic Development Division
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-Poverty Strategy Non-Housing Community Development Strategy Economic Development Market Analysis
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Met with Office of Business Resources Manager on 8/13/2024 to discuss needs of the microenterprise community that is also part of our target low- to moderate-income demographic. Will forward Consolidated Plan to agency to continue discussion for improved performance.
8	Agency/Group/Organization	City of Madison Mayor's Office
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Anti-Poverty Strategy Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.
9	Agency/Group/Organization	City of Madison Building Inspection Division
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.
10	Agency/Group/Organization	Dane County Department of Human Services: Housing Access and Affordability
	Agency/Group/Organization Type	Other Government - County
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Anti-Poverty Strategy Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of the development and sharing of public comment received on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.

11	Agency/Group/Organization	City of Madison Department of Planning and Community & Economic Development
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.
12	Agency/Group/Organization	City of Madison Community Development Authority
	Agency/Group/Organization Type	Housing PHA Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as part of regular meetings of the City's Housing Strategy Team to collect comments on needs, trends and priorities for the City of Madison. Will forward Consolidated Plan to agency to continue discussion for improved performance.
13	Agency/Group/Organization	Tenant Resource Center
	Agency/Group/Organization Type	Civic Leaders Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the agency as one part of numerous consultation groups on 09/05/2024 to collect comments on needs, trends and priorities for the City of Madison. This agency engages with households facing housing instability – an underrepresented demographic in the survey and public hearings that disproportionately reflects other marginalized identities (i.e., race, gender, ethnicity, citizenship status). The agency also maintains an Eviction Map that combines eviction data from court records with demographic data from the U.S. Census to provide an up-to-date, historical view of where evictions are (and aren't) happening in Dane County, Wisconsin. Will forward Consolidated Plan to agency to continue discussion for improved performance.
14	Agency/Group/Organization	Neighborhood Resource Team (NRT) Leaders
	Agency/Group/Organization Type	Civic Leaders Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Housing Community Development Strategy Anti-poverty strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with group on 08/07/2024 as one part of numerous consultation groups to collect comments on needs, trends and priorities for the City of Madison. NRT leaders facilitate monthly meetings with neighborhoods that tend to have lower household incomes than the rest of Madison. Collected comments can be found in Appendix A . Will forward Consolidated Plan to agency to continue discussion for improved performance.

15	Agency/Group/Organization	ECCHO: Engaging Communities to Change Health Outcomes
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy Housing Non-Housing Community Development Strategy
	How was the Agency, Group or Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?	Met with group on 05/22/2024 as one part of numerous consultation groups to collect comments on needs, trends and priorities for the City of Madison. Group-collected comments can be found in Appendix A . Will continue communication with group on the Consolidated Plan as it moves forward.

Agencies, groups, organizations who participated

Strategies & Actions to Alleviate Impediments to Fair Housing Choice

Meeting our local need for affordable housing is only possible if many stakeholders work together towards common goals. While these recommendations focus on ways the City of Madison can continue to support housing initiatives, it acknowledges reliance on investment from and collaboration with private and non-profit partners. While recommendations were discussed with the specific goal to increase student housing, affordable multi-family rental and homeownership supply, some recommendations could be applicable to all three.

Sustain, and build on, the City's Affordable Housing Initiative which focuses primarily on the production and preservation of affordable rental housing by leveraging federal low-income housing tax credits.	Status	Focus
Within the structure of WHEDA's tax credit program, prioritize City Affordable Housing Fund (AHF) support to developments most responsive to areas of acute need in the Madison market – housing for households with very low incomes (30% CMI), larger (3- and 4-bedroom) units, or those that face higher barriers to housing (permanent supportive housing).	Ongoing	Rental
Steer developments to amenity-rich areas of the city – close to public transit corridors, parks, employment and retail centers, etc.	Ongoing	Rental
Strengthen efforts to acquire desirable properties and make them available for affordable housing development.	Ongoing	Rental
Use City financial support to leverage longer periods of affordability.	Ongoing	Rental

Continue efforts to support a variety of affordable housing development types and scales, acknowledging that the amount of City subsidy per home may be far greater than when leveraging federal low-income tax credits.	Status	Focus
Continue to dedicate a portion of City AHF funds for smaller scale developments.	Ongoing	Rental/ Homeowner
Prioritize efforts of mission-driven, non-profit housing developers, particularly those that serve lower-income households and/or offer longer-term, or permanent, affordability.	Ongoing	Rental
Conduct a systematic review of all City-owned properties to identify sites that might be suitable for affordable housing development, and where appropriate, make those sites available for development.	Ongoing	Rental
Use land banking funds to acquire properties suitable for a variety of development types and sizes including duplexes, fourplexes and similar small-scale projects.	Ongoing	Rental/ Homeowner
Maximize the redevelopment potential of CDA-owned public housing sites for a variety of new affordable housing options.	Ongoing	Rental

Pursue a regulatory framework that ensures high quality development outcomes without imposing unnecessary burdens on developers.	Status	Focus
Establish performance and accountability measures around review processes.	New	Rental/ Homeowner
Explore ways for the City to streamline the scheduling and review of affordable housing development proposals.	New	Rental/ Homeowner
Create pre-approved building plans for very small-scale developments that could be used by developers/property owners to help expedite the permitting process.	New	Rental/ Homeowner
Explore opportunities to improve communications and alignment between City agencies involved in the review of housing development.	Ongoing	Rental/ Homeowner

Explore and leverage partnerships with community technical colleges and trade programs to promote and encourage careers in construction trades.	Status	Focus
Advocate for State/Federal funding for technical school recruitment and training for careers in the trades	New	Rental/ Homeowner

Expand efforts to support development community in Madison and regionally.	Status	Focus
Leverage federal infrastructure funding, such as the Inflation Reduction Act (IRA), for the production, preservation, and improvement of local housing supply by aligning housing, infrastructure and climate resilience planning.	Ongoing	Rental
Technical Assistance: Beyond one-on-one technical assistance provided now, establish an annual or biennial workshop to inform new developers about opportunities to finance projects and details of the development review and permitting processes. Record all or portions of this workshop so that it can be viewed on-demand.	New	Rental/ Homeowner
Review Tax Incremental Financing (TIF) policy to more aggressively support affordable housing development	Starting	Rental
Explore policies that could relieve a portion of public infrastructure improvement costs from affordable housing developers	Starting	Rental
Consider policies to reduce the risk of pre-development costs for non-profit and BIPOC developers	New	Rental

Engage local developers, real estate professionals, residential homebuilders and community members to refine local housing supply goals.	Status	Focus
Annual Public Hearing by Housing Policy Committee, invite developers to discuss City process that relates to approval processes for plans, funding and operations to gather feedback on challenges to increasing, preserving and improving housing.	New	Rental/ Homeowner
Capacity building for new ownership models, such as co-housing	New	Homeowner
Play an active role in regional efforts to promote affordable housing development outside of Madison	Ongoing	Rental/ Homeowner
Explore what can be done to encourage “overhoused” homeowners to downsize and, in turn, free up existing housing stock in the Madison market.	New	Homeowner
Explore infill opportunities for low density residential, that results in net gain of units. Including lot sub-division, single lot re-development and allowing 2 family dwelling units or Accessible Dwelling Units.	New	Homeowner
Explore partnerships for manufactured and modular housing to be created in Madison.	New	Homeowner
Explore tools to curb the net loss of units as a result of new single-family home construction/replacements	New	Homeowner

Make a concerted effort to address current market barriers to residential condominiums	Status	Focus
Work with Wisconsin Realtors Association to revise State law affecting condominium conversions.	New	Homeowner
Advocate to WHEDA to provide financial support for condominium developments	New	Homeowner
Encourage local lenders to ease financing restrictions (pre-sale requirements) for condominium developments Explore development of a local pipeline of interested condominium buyers	New	Homeowner
Consider Affordable Housing Fund initiative for expansion of affordable owner-occupied opportunities.	Ongoing	Homeowner

PRELIMINARY STUDENT HOUSING RECOMMENDATIONS	Status	Focus
Entitlement process changes		
Speed up pre and post entitlement processes	Starting	Student
Comprehensive Plan and zoning changes by eliminating any height limits more restrictive than the State Capitol view preservation	New	Student
Comprehensive Plan and zoning changes by eliminating subjective approvals	New	Student
Prioritize new area plans; while adding more density to plans	Ongoing	Student
Prioritize new area plans; encourage City of Madison grant/small-cap TIF funding for smaller housing projects.	Ongoing	Student
Allow a developer to pay for an outside consultant to lead an amendment to an existing neighborhood plan so that higher-density housing can be approved before a new area plan is adopted	New	Student
Encourage flexibility of use in new housing developments – workforce housing (City). High priority and high feasibility. - Product that serves the entire market. - Focus on all populations; not just one subpopulation	New	Student
Encourage additional comprehensive market analysis in greater downtown area, in particular rigorously identify the actual inventory of student housing.	New	Student
Identify development fees and regulations, which if altered would contribute to housing affordability.	New	Student
Encourage a comprehensive market analysis for Madison College students.	New	Student
Encourage the City of Madison to work with UW on housing education programs with students	New	Student

CONSTRAINTS

There are many other factors that impact the local housing market, some of which impede the ability to expand the supply of affordable housing. These include, for example, limitations on primary sources of funding, labor shortages, rising costs of construction and access to first mortgage financing.

FUNDING

The City's commitment of local tax dollars to affordable housing development since 2014 has done much to increase the level of development activity. The Committee recognizes that impact and encourages the City to sustain its commitment. However, these funds have been used primarily to attract and leverage other financing. Most notably, for multifamily projects, that other financing has included low-income housing tax credits (LIHTC). While a powerful resource, the availability of these

credits in any year is limited as they are allocated to projects across the state of Wisconsin. Moreover, the tax credits heavily influence the profiles of the developments including, for example, the rent levels and household incomes that are served.

LABOR

The construction and preservation of housing requires a specialized workforce. As with many parts of the country, the supply of skilled workers in the trades is declining, making it more difficult for developers to secure needed labor, and raising wage rates. The local market needs more individuals working in the construction trades. Training that workforce should be a priority.

COST OF CONSTRUCTION

One of the enduring effects of the pandemic has been the disruption in the nation's supply chains and resultant volatility in materials' costs, which have led to project delays or cancellations. While it is difficult to predict cost of materials with much precision, it is reasonable to expect that cost pressures and volatility in supply chains will persist during the next ten years. In addition, land costs in Madison have steadily increased, further exacerbating development costs and increasing financing gaps that developers turn to local, state, or federal funding sources to close.

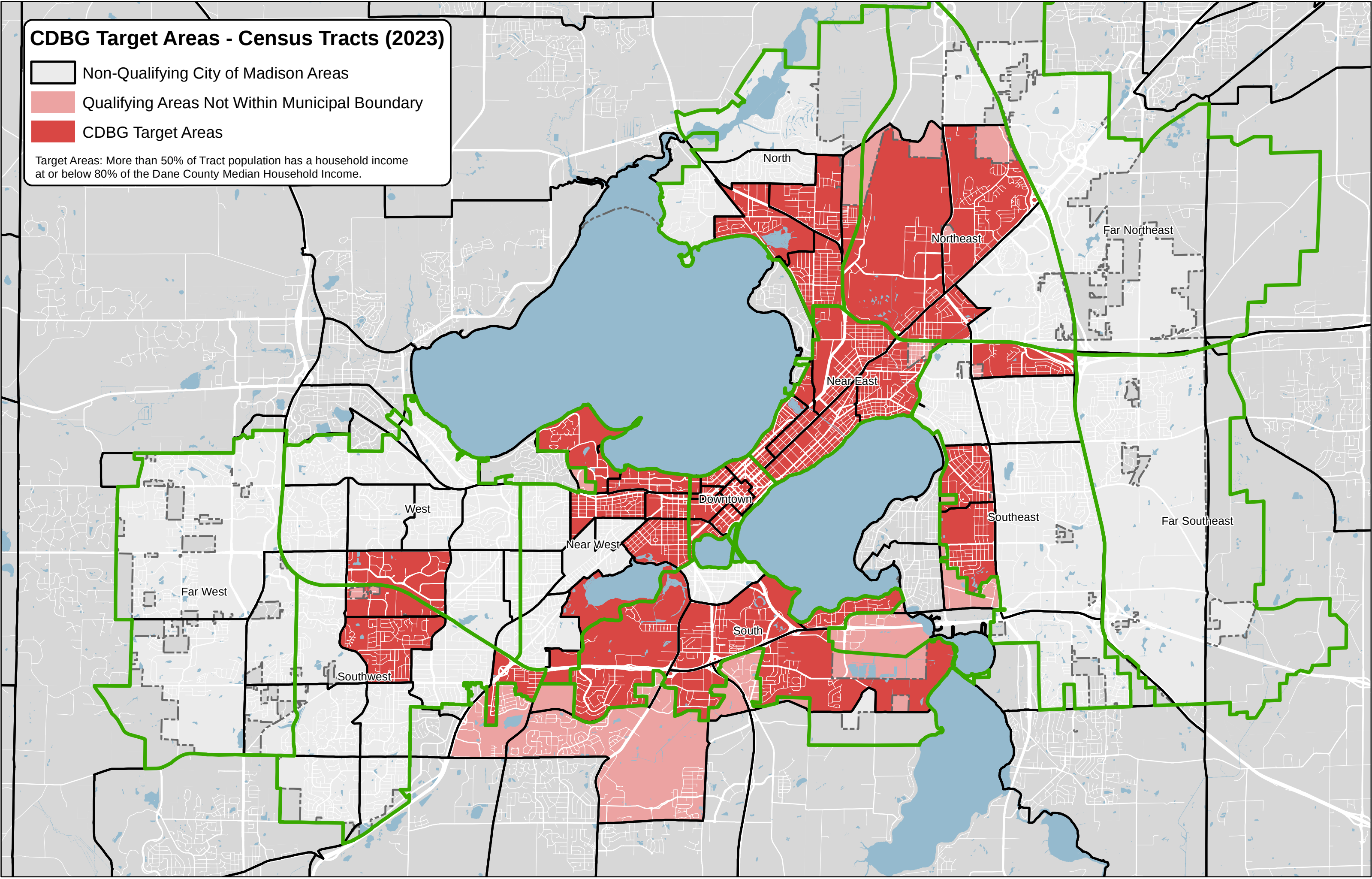
PRIVATE MORTGAGE FINANCING FOR HOUSEHOLDS EARNING LESS THAN 80% AMI:

Anyone who has purchased a home knows that the process itself can be challenging. Buyers must first determine how much mortgage financing they can secure and then find a home to suit their budget. For lower-income households that process is even more difficult. While programs like Madison's Home Buy-the American Dream can offer assistance for households with incomes below 80% AMI, it is still difficult for them to qualify for a first mortgage or to find a home that they can afford.

CDBG Target Areas - Census Tracts (2023)

- Non-Qualifying City of Madison Areas
- Qualifying Areas Not Within Municipal Boundary
- CDBG Target Areas

Target Areas: More than 50% of Tract population has a household income at or below 80% of the Dane County Median Household Income.

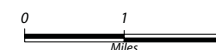
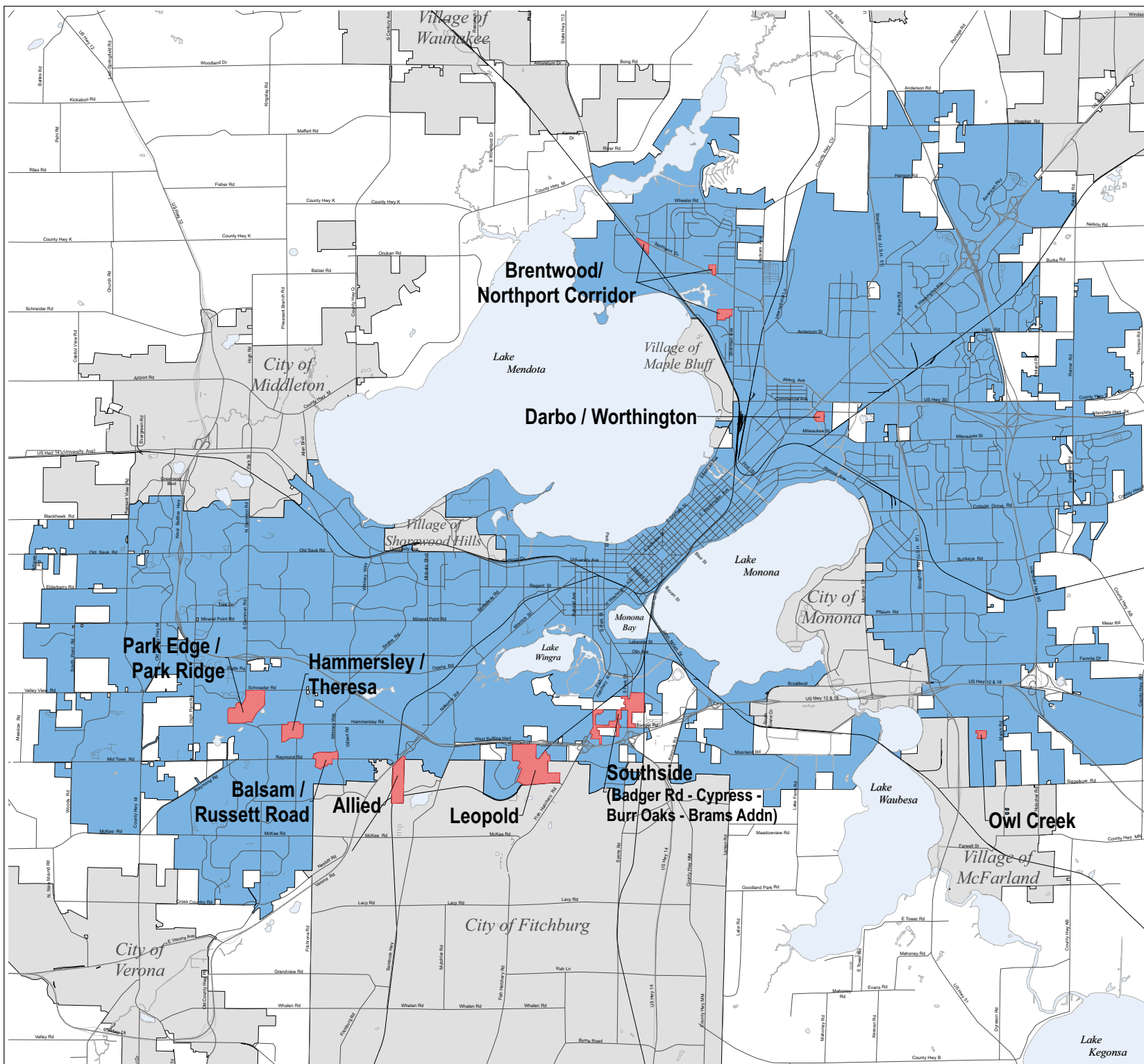


Neighborhood Resource Team Focus Areas

- NRT Focus Areas**
- City of Madison**
- Other Cities and Villages**

Neighborhood Resource Teams Allied

- Balsam / Russett**
- Brentwood / Northport Corridor**
- Darbo / Worthington**
- Hammersley / Theresa**
- Leopold**
- Owl Creek**
- Park Edge / Park Ridge**
- Southside**



City of Madison

Community Development Division



Emergency Solutions Grant (ESG) Policies and Procedures Manual

Last updated March 2022

Chapter 1: General Information

The City of Madison is a Recipient of federal Emergency Solutions Grant (ESG). The City's Community Development Division (CDD) contracts with local homeless services agencies (sub-recipients) to deliver services in the City of Madison. ESG sub-recipients are required to follow all federal requirements, policies, and procedures. Sub-recipients may only operate the types of programs that have been included in their written contract agreement with the city. In the event of a conflict between the language specified in the contract and this manual or other supporting documents, the provisions in the contract shall take precedence.

Applicable Regulations

HUD ESG Interim Rule (for ESG funds)

<https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part576.xml#seqnum576.100>

Dane County CoC Written Standards

All EHH funded projects must comply with applicable sections of the local Written Standards. Submission of the applicable Written Standards Checklists will be required for this RFP. Dane County CoC Written Standards can be found on the Homeless Services Consortium of Dane County website: <https://www.danecountyhomeless.org/governance>.

Consultation with Continuum of Care

The HEARTH Act amendments to the McKinney-Vento Act contain provisions requiring coordination, collaboration, and consultation between Continuums of Care and ESG state and local government recipients. The McKinney-Vento Act requires “collaborative applicants” under the Continuum of Care program to participate in the Consolidated Plan for the geographic areas they serve and analyze patterns of use and evaluate outcomes for ESG projects in those areas. ESG recipients in turn must consult with these collaborative applicants on the allocation of ESG funds and participate in HMIS, which the collaborative applicants are required to establish.

Program Overview

ESG is federally administered by the United States Department of Housing and Urban Development (HUD). HUD awards ESG funding to the City of Madison to distribute to eligible applicants.

Program	Authorized By	Project Types
Emergency Solutions Grant (ESG)	1991 McKinney-Vento Homeless Assistance Act. Amended in 2009 by Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 200924 CFR 576	Rapid Re-Housing
		Homelessness Prevention
		Emergency Shelter
		Street Outreach
		Data Collection (HMIS)
		Administrative Costs – City of Madison Only

Chapter 2: Application Process

Eligible Applicants

Eligible applicant agencies must have current, direct experience in delivering services to people experiencing homelessness and meet the following eligibility criteria:

- Applicant agencies must be incorporated as private non-profit organizations in the State of Wisconsin and have been granted 501(c)(3) tax-exempt status by the United States Internal Revenue Service; and
- The applicant's 501(c)(3) status must be in good standing and not have been revoked in the previous calendar year; and
- The applicant, its officers, and employees are not currently debarred or suspended from doing business with the Federal Government, State of Wisconsin or a local government; and
- The applicant does not have unresolved current or past contract non-compliance, nonperformance, suspension, termination, or other adverse audit finding with one or more funders in the past five (5) years.

Request for Proposal (RFP)

CDD will issue a Request for Proposal for homeless services, including ESG funds, every four to five years. The RFP will be developed in consultation of CoC.

Environmental Review

All sub-recipients must complete either an Environmental Review Determination Exemption form or Environmental Review Questions as appropriate. Agencies are not required to complete either form if they are exclusively receiving Administration and/or HMIS funding.

- **Environmental Review Determination of Exemption Form:** Typically, sub-recipients for non-rehab emergency shelter, rapid re-housing, homelessness prevention, and street outreach projects will use this form to satisfy their environmental review requirements.
- **Environmental Review Questions:** Typically, sub-recipients receiving funding for emergency shelter rehabilitation must use this form. Agencies wishing to apply for extensive emergency shelter rehabilitation costs that will change the use, size, capacity, or character of a structure must contact the ESG Program Manager for guidance prior to submitting an application.

Sub-recipient or any contractor thereof may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG funded project until HUD and/or CDD have performed an environmental review under 24 CFR part 50 and approved the property. This is necessary even if ESG funds are not used to fund the work done to the property.

Minimum Standards for Emergency Shelters

All sub-recipients receiving emergency shelter funds (not including motel voucher programs) must submit a completed Minimum Standards for Emergency Shelters form.

Match

ESG requires a one hundred percent match commitment. Matching funds are provided based on the total grant amount and do not have to be provided on a component-by-component basis. For example, if a recipient is spending \$10,000 on HMIS, they do not need to find \$10,000 in data collection funds from another source to use as match.

Match Categories

Match categories include:

- Other Non-ESG HUD Funds
- Other Federal Funds
- State Government
- Local Government
- Private Funds
- Other
- Fees
- Program Income (Returned Utility or Security Deposits)

Eligible Match Sources

- Cash contributions which are expended for ESG-allowable costs
- Noncash contributions – the value of any real property, equipment, goods, or services contributed to the ESG program, provided that, if they were to have been procured using grant funds, they would have been an allowable expense
- The value of any donated material or building received during the grant cycle. The agency may count either depreciation of the building and fair rental charges for the land for each year the building is used for the recipient's ESG program or, if the building is donated for long-term use in the recipients ESG program, the fair market value of the capital assets, as specified in 2 CFR 200.306(h)(2), (i), and (j). To qualify as a donation for long-term use, the donation must be evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date.
- The value of any lease on a building
- Any salary paid to staff to carry out the program of the sub-recipient
- The value of the time and services contributed by volunteers to carry out the program
 - o The value of volunteer time may be determined by each agency; the value must be reasonable and appropriate for the services provided
 - o For services provided by a professional, the value can be the hourly rate charged by that professional
- Program income in the form of returned utility or security deposits
- Donations and/or grants

Match Requirements

- Match must be used in accordance with all requirements that apply to ESG grant funds except the expenditure limits in 24 CFR 576.100.
- If the matching funds are from another state or federal program, they must also be used in accordance with that program's requirements.

- If an agency uses City of Madison General Purpose Revenue (GPR) funds as match to its ESG allocation, all ESG rules and requirements apply to clients served with the matching funds.
- Match must be spent by the expenditure deadline which applies to the ESG funds being matched.
- HUD federal funds may not be used to match State ESG.
- Match spent on ESG may not be used to match any other federal program's funds.
- Matching funds may not be used to match more than one ESG grant.

Match Documentation

All proposed match must be documented at the time of application, and all documentation must be submitted with the application. Documentation requirements for different kinds of match are as follows:

- For funds provided by units of local or state government, churches, foundations, or the United Way which will be used to match ESG funds: copies of the funding award and/or commitment letter from these sources on their official letterhead and signed by an authorized signatory of the funding organization.
- For donated volunteer hours, donations from businesses or individuals, client rent/boarder fees, or client program service fees which will be used to match ESG funds: a letter on applicant's letterhead signed by an authorized signatory describing how the applicant will maintain records of these match sources, the total amount of the match expected to be received, and, in the case of volunteer hours, the number of hours expected to be donated.
- For the value of a donated building or any lease: documentation of the fair market value of the building or lease.
- For staff salaries: a letter on applicant's official letterhead signed by an authorized signatory describing the funding source of the salaries and the exact amount of match to be provided.

Chapter 3: Program Requirements

Written Standards

Sub-recipients of ESG funding must adhere to Dane County Continuum of Care (CoC)'s written standards for each program type (rapid re-housing, homelessness prevention, emergency shelter, and street outreach).

At a minimum, written standards must include the following:

- i. Standard policies and procedures for evaluating eligibility for assistance;
- ii. Standards for targeting and providing essential services related to street outreach;
- iii. Policies and procedures for admission, diversion, referral, and discharge by emergency shelters, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
- iv. Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- v. Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers;
- vi. Policies and procedures for determining and prioritizing which eligible households will receive homelessness prevention assistance and which eligible households will receive rapid re-housing assistance (*must include an emergency transfer priority*);
- vii. Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
- viii. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- ix. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

Participation of People with Lived Experience

To the maximum extent possible, sub-recipients must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted with ESG.

To the maximum extent practicable, sub-recipients must have representation of a person who is homeless or was formerly homeless on either:

- The Board of Directors; or

- An equivalent policymaking entity directly responsible for making policy for the project(s) for which funding is being requested.

Involuntary Family Separation & Nondiscrimination

All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marriage status identifying as a family at must be served as a family by any project which serves families. There can be no involuntary separation.

- (1) Any emergency shelter that serves families must serve all eligible families regardless of their gender composition – e.g. emergency shelters which serve families may not serve exclusively women and children.

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.

Families with children under age 18 must not be denied admission to any family shelter based on the age of any child under age 18. An example of a prohibited admission policy would be denying a family admission because there is a 16-year-old in the family.

Conflict of Interest

ESG regulations require compliance with organizational, individual, and procurement conflict of interest provisions. Sub-recipients will be required to repay any ESG funds disbursed for persons with whom there is an identified conflict of interest unless an exception is granted from HUD.

Organizational Conflicts of Interest

1. Sub-recipients must not condition ESG assistance on a participant’s acceptance of housing or emergency shelter owned by the sub-recipient or a parent or subsidiary of the sub-recipient.
2. Sub-recipients must not conduct an initial evaluation or provide homelessness prevention assistance to persons living in property owned by the sub-recipient or a parent or subsidiary of the sub-recipient.

Individual Conflicts of Interest

The individual conflict of interest regulations prohibit financial gain for self, family, or those with business ties.

1. No person who exercises responsibility over ESG funded projects or who is in a position to participate in a decision-making process or gain inside information with regard to ESG funded projects may:
 - a. Obtain a financial interest or benefit from an assisted activity
 - b. Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity
 - c. 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

Individual Conflict of Interest Exception Process

Upon written request of the sub-recipient, HUD may grant an exception to the provisions above on a case-by-case basis. The most common situation where an exception is requested is when a family member of an employee needs ESG assistance (e.g., the family member of an employee experiences homelessness and applies for rapid re-housing assistance). Follow the steps below if a conflict of interest is identified when providing ESG funded assistance.

1. Submit a request for an exception in writing to CDD. The request must contain the following items:
 - a. A narrative of the situation, which must contain the name and title of the person for whom the exception is requested, and a brief description of the person's position as it relates to the HUD-assisted project or contract award. The narrative must also address all applicable factors below.
 - i. Whether the person is a member of a group or class of persons intended to be the beneficiaries of the HUD-assisted activity, and if so, whether the exception would permit the person to receive generally the same interests or benefits being made available or provided to the group or class.
 - ii. Whether the affected person has withdrawn from his or her functions or responsibilities or the decision-making process with respect to the specific assisted activity in question.
 - iii. If the agency requesting an exemption is a government, they must also provide an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made.
 - iv. Any other relevant considerations.
2. CDD will review the request for exception based on the above factors and any other applicable information. In determining whether to grant the requested exception, CDD shall consider whether an exception will serve to further the purposes of the ESG program and the effective and efficient administration of the organization's project. If the request is deemed appropriate, CDD will seek a legal opinion from the City of Madison Attorney's Office stating whether there would be a violation of local, state, or federal law if the exception were granted.
 - a. If the legal opinion obtained from City of Madison Attorney's Office is not favorable to the request, no exception will be granted.
 - b. If the legal opinion obtained from City of Madison Attorney's Office is favorable to the request, CDD will send a recommendation, along with the original request, seeking HUD's determination.
3. When HUD responds to the request for an exception, CDD will notify the sub-recipient of the decision. At any point, CDD reserves the right to refuse a request for an exception. If this occurs, a written response will be provided.

Procurement Conflicts of Interest

In the procurement of property and services, the conflict-of-interest provisions at 24 CFR 85.36 and 24 CFR 84.42 apply. These regulations require sub-recipients to maintain written standards governing the performance of their employees engaged in administering contracts.

Confidentiality

Sub-recipients must develop and implement written confidentiality procedures to ensure:

1. All records containing personally identifying information of any person or family who applies for and/or receives ESG assistance will be kept secure and confidential.
2. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public except with written authorization of the person responsible for the operation of the shelter.
3. The address or location of any housing of a program participant will not be made public except as provided under a preexisting privacy policy of sub-recipient and consistent with all applicable state and local laws regarding privacy and obligations of confidentiality.
4. Sub-recipients must develop and implement procedures to ensure the confidentiality of records pertaining to any person provided family violence prevention or treatment services under any project assisted under the ESG 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.

Violence Against Women Act (VAWA)

VAWA prohibits denial or termination of assistance or eviction solely because a person is a victim of domestic violence, dating violence, sexual assault, or stalking. This protection applies to all eligibility and termination decisions that are made with respect to ESG rental assistance.

Sub-recipients that determine eligibility for or administers ESG rental assistance are responsible for ensuring that a notice of VAWA protections (HUD forms 5380 and 5382) are provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times:

- (1) When an individual or family is denied ESG rental assistance
- (2) When a program participant begins receiving ESG rental assistance
- (3) When a program participant is notified of termination of ESG rental assistance
- (4) When a program participant receives notification of eviction

The VAWA Lease Addendum (HUD form 91067) must also be included with every lease.

Emergency Transfer Plan

Sub-recipients must develop and implement an emergency transfer plan compliant with 24 CFR 5.2005(e).

Coordinated Entry

Each HUD COC is required to develop and operate a coordinated entry system. ESG sub-recipients must participate in coordinated entry for Dane County CoC. Program participation in coordinated entry will be reviewed during annual monitoring. Victim service providers may choose not to use the CoC's coordinated assessment system.

Coordinated entry refers to a single place or process for people to access homelessness prevention, housing, and related services within a given CoC. It includes the following core components:

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

Faith-Based Activities

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

- Sub-recipients must not discriminate against any employee or applicant for employment and must not limit employment or give preference in employment to persons on the basis of religion.
- Sub-recipients must not discriminate against any person applying for shelter or services and must not limit shelter or services or give preference to persons on the basis of religion.
- Sub-recipients 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 ESG.
 - o If a sub-recipient conducts these activities, the activities must be offered separately in time or location from the programs or services funded under ESG, and participation must be voluntary for ESG program participants.

Recordkeeping and Retention

Sub-recipients must have written policies and procedures in place to ensure all recordkeeping requirements are met. CDD must also maintain a copy of any executed contract with any sub-recipient which relates to project activities funded under their ESG contract.

Program and financial records for sub-recipients must be maintained for a minimum of five years after the final expenditure under their ESG contract. Emergency shelter conversion records must be maintained for a minimum of ten years from initial obligation if the costs are greater than 75% of the post-conversion value.

Participation in HMIS, HIC, PIT

Homeless Management Information System (HMIS)

All sub-recipients must participate in HMIS and comply with participation requirements.

Victim service providers cannot participate in HMIS and Legal Services Organizations may choose to not participate in HMIS. Providers which do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports. The comparable database

must be capable of producing all ESG-required reports.

Housing Inventory Chart

Each COC must complete a census for the fourth Wednesday of the month for all emergency shelters (including motel voucher programs), rapid re-housing programs, permanent housing, safe haven, and transitional housing programs. This information is reported on the Housing Inventory Chart (HIC) maintained by the HUD CoCs. The data is required of all agencies with the above-referenced program types regardless of whether they participate in HMIS or a comparable system.

Point-in-Time

All sub-recipients receiving ESG funds must actively participate in the overnight Point-in-Time (PIT) unsheltered count conducted CoC wide during the last ten days of January.

Participation in Continuum of Care

Sup-recipients must participate in Dane County CoC. Participation can take many forms, including:

- Attend CoC membership meetings
- Participate in a CoC committee
- Participate in advocacy efforts organized by the CoC
- Use CoC data when talking about homelessness in your community
- Attend CoC sponsored training
- Participate in coordinated entry

Monitoring and Enforcement

Purpose for Monitoring

HUD requires that ESG recipients should establish policies and procedures for monitoring sub-recipients and ensuring that ESG requirements are being implemented appropriately. Monitoring provides information to assure that recipients are using ESG funds efficiently and effectively in accordance with federal law, HUD federal guidelines and standards established by the CoC. Monitoring is also used to provide assistance on performance and technical areas in the delivery of services to the homeless population in their communities.

Definitions

Concern - A deficiency in program performance not based on a statutory, regulatory or other program requirement. Sanctions or corrective actions are not authorized for concerns. However, CDD will bring the concern to the agency's attention and, if appropriate, may *recommend* (but cannot require) actions to address concerns and/or provide technical assistance.

Finding - A deficiency in program performance based on a statutory, regulatory or program requirement for which sanctions or other corrective actions are authorized.

On-site monitoring - Monitoring that is conducted at the agency location. This monitoring includes review of forms and supporting documentation along with staff interviews. Unit inspections and participant interviews are also conducted during an on-site monitoring.

Desk monitoring – Monitoring that is conducted remotely, typically at the office of the Monitoring and Compliance Coordinator. All forms and supporting documentation will be submitted via electronic mail, or postal service if requested.

Approach to Monitoring

The monitoring process is intended to provide guidance and assistance along with observing progress and quality of services. The monitoring process should have open communication and on-going evaluation to make the process successful.

The overriding goal of monitoring is to determine compliance, prevent/identify deficiencies and design corrective actions to improve or reinforce project performance. We also want to acknowledge the efforts and good practices that agencies have and share with other agencies in the City to increase success for all agencies and communities in the continuum.

Monitoring Timeline

It is the intent of CDD to conduct monitoring for every agency that has an ESG funded project at least every other year.

This does not preclude a monitoring to be triggered to occur more frequently. In the event CDD has reason to believe a monitoring should occur sooner than the two year cycle, monitoring staff will give notice to that agency. Events that would lead to a monitoring include: complaints or grievances filed with CDD or CoC regarding ESG funded project, poor system performance measures, annual funds being relinquished to HUD or any reason to believe there is misuse of federal funds. CDD will communicate with the agency the concerns leading up to the monitoring and the monitoring could be focused on those activities and/or area(s) of concern or could lead to a full monitoring.

When a monitoring will occur, the WI BOSCOG will issue a notice to the agency at least 30 days prior. The notice will be addressed to the Executive Director and will also include the Program Manager and sent via electronic mail. The notice and monitoring packet are sent to the agency in order to prepare for the monitoring. The agency is responsible to submit all required documents based on the following timeline:

- On-site Monitoring - The WI BOS Monitoring Form must be submitted to the Monitoring and Compliance Coordinator no later than seven (7) days prior to an on-site visit. All supporting documents need to be prepared and ready at the start of the on-site monitoring. Unless requested, supporting documents should not be submitted via electronic mail. In the event that an agency has multiple COC projects being monitored, a monitoring form MUST be filled out for each project as each project is monitored separately. Any documents submitted after the deadline will result in a finding.
- Desk Monitoring – All documents, including supporting documentation must be submitted by the timeline indicated in the monitoring notice. Submission can occur through electronic mail or by postal mail. Please note that postal mail must be post-marked by the due date in the monitoring notice.

On the day of the on-site monitoring, all paperwork must be prepared and presented to the Monitoring and Compliance Coordinator upon their arrival. If all paperwork is not presented, this will result in a finding. All documents should be labeled and presented in the order asked on the monitoring form.

During the monitoring program staff should be available to answer questions. Program staff includes: program directors, case managers and any direct line staff. Staff from the finance department should also be available to answer additional questions that may arise during review of the financial portion of the monitoring. On-site monitoring will also include unit visits as well as meeting with project participants.

Notification of Monitoring

CDD will monitor the performance of ESG sub-recipients at least every other year. In conducting performance reviews, information will be obtained from the records and reports from onsite or desk monitoring, audit reports, and information from HMIS. Monitoring reviews to determine compliance with specific program requirements will be conducted as necessary.

Components of a Monitoring

During CDD's sub-recipient monitoring, several different components may be reviewed, including:

- Personnel policies and procedures, such as conflict of interest and confidentiality policies
- Fiscal policies and procedures, including those related to the value of volunteer time
- Funding-specific requirements, such as homeless participation
- Client files
- Backup documentation (e.g. invoices, timesheet, payroll reports) supporting reimbursement requests
- Performance
- Participation in HMIS or HMIS-comparable database
- Compliance with coordinated entry and CoC written standards
- Participation in the January Point-in-Time (PIT) count
- Completion of monthly Housing Inventory Chart (HIC) report
- Compliance with the ESG CAPER

Expectations for CDD

CDD is expected of the following in addition to those listed above:

- Issue agreements or contracts with each sub-recipient laying out expectations regarding matters such as the use of grant funds, monitoring expectations, payment requests, and eligible activities
- Collect and review invoices from sub-recipients to ensure proper payment requests
 - Backup documentation should be collected at least once per grant cycle to ensure proper usage of funds

- Ensure timely payment disbursement to sub-recipients
 - Sub-recipients must be reimbursed within 21 days of submitting an invoice with no issues
- Ensure that each sub-recipient meets HMIS compliance standards, if applicable
- Ensure that information such as new rules or income/rent limits is promptly passed along to sub-recipients
- Facilitate communication for sub-recipients
- Ensure that the process for allocating ESG funds locally is fair and transparent

Expectations for Sub-Recipients

Sub-recipients of ESG are expected of the following:

- Comply with all funding requirements
- Submit invoices and reports on a timely basis
- Undergo and complete a monitoring review as requested
- Notify CDD of any concerns related to the performance
- Ensure all funds are spent in an appropriate manner within the agreed-upon budget
- Request budget adjustments to CDD as needed to fully spend out all funds
- Meet all HMIS compliance standards, if applicable

Chapter 4: Project Types

Rapid Re-housing

Rapid re-housing assistance aims to help homeless households move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services. Funds used to provide rapid re-housing assistance must be used to provide assistance in permanent housing. Living in a motel or hotel is not considered to be permanent housing and therefore is not an eligible expense under this program.

Overview of Eligible Activities

- a) **Housing Payments** (short-term and medium-term rental assistance, *24 CFR §576.106*):
 - a. Rental *application fees* which are charged by the owner to all applicants
 - b. *Security deposits* which are equal to no more than two months' rent
 - c. *Rent payments*: Short- (up to 3 months) and medium-term (4-24 months) rental assistance. The total length of assistance may not exceed 24 months during any 3-year period, including any payment of arrearages
 - d. *Utility deposits and payments* (gas, electric, water, sewer)
 - i. Utility deposits are only eligible if they are required by the utility company for all customers
 - ii. Utility payment assistance can be provided for up to 24 months, including up to 6 months for payments in arrears
 - e. *Moving costs* (e.g. truck rental, moving company, up to 3 months of storage)
 - i. The payment of temporary storage fees in arrears is an ineligible expense
 - f. *Arrearages*: A one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears, provided this assistance will allow the client to retain their current permanent housing or to obtain new permanent housing
- b) **Housing Services** (housing relocation and stabilization services, *24 CFR §576.105*):
 - a. *Housing search and placement* necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
 - b. *Housing stability case management* to pay the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing.
 - i. *Note for ESG funds*: Housing stability case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the client is living in permanent housing. If it takes longer than 30 days to locate permanent housing, continued case management must be charged to street outreach or emergency shelter case management, depending upon where the client is residing
 - c. *Mediation* between the program participant and the owner or persons(s) with whom the participant is living, providing that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

- d. *Legal services* as set forth in subsection 576.102 (a) (1) (vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem which prohibits the program participant from obtaining or maintaining permanent housing.
 - i. Note: Retainer fee arrangements and contingency fee arrangements, as well as legal services for immigration and citizenship matters and issues relating to mortgages, are ineligible costs.

Note: the combination of rent payments and arrearages assistance may not exceed 24 months in a three-year period. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Agencies may tailor their rapid re-housing rental assistance by specifying in their written standards:

- The maximum amount or percentage of rental assistance that a program participant may receive.
- The maximum number of months that a program participant may receive rental assistance (not to exceed 24 months in a three-year period).
- The maximum number of times that a program participant may receive rental assistance.
- The extent to which a program participant must share the cost of rent.

Homelessness Prevention

Homelessness prevention programs include housing relocation and stabilization services and rental assistance as necessary to prevent households from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Funds used to provide homelessness prevention assistance must be used to provide assistance in permanent housing. Living in a motel or hotel is not considered to be permanent housing and therefore is not an eligible expense under this program.

Overview of Eligible Activities

- a) **Housing Payments** (short-term and medium-term rental assistance, 24 CFR §576.106):
 - a. *Rental application fees* which are charged by the owner to all applicants
 - b. *Security deposits* which are equal to no more than two months' rent
 - c. *Rent payments*: Short- (up to 3 months) and medium-term (4-24 months) rental assistance. The total length of assistance may not exceed 24 months during any 3-year period, including any payment of arrearages.
 - d. *Utility deposits and payments* (gas, electric, water, sewer)
 - i. Utility deposits are only eligible if they are required by the utility company for all customers.
 - ii. Utility payment assistance can be provided for up to 24 months, including up to 6 months for payments in arrears
 - e. *Moving costs* (e.g. truck rental, moving company, up to 3 months of storage)

- i. The payment of temporary storage fees in arrears is ineligible.
- f. *Arrearages*: A one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears, provided this assistance will allow the client to retain their current permanent housing or to obtain new permanent housing.
- b) **Housing Services** (housing relocation and stabilization services, 24 CFR §576.105):
 - a. *Housing search and placement* necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
 - b. *Housing stability case management* to pay the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing.
 - c. *Mediation* between the program participant and the owner or persons(s) with whom the participant is living, providing that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.
 - e. *Legal services* as set forth in subsection 576.102 (a) (1) (vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem which prohibits the program participant from obtaining or maintaining permanent housing.
 - i. Note: Retainer fee arrangements and contingency fee arrangements, as well as legal services for immigration and citizenship matters and issues relating to mortgages, are ineligible costs.

Note: the combination of rent payments and arrearages assistance may not exceed 24 months in a three-year period. No ESG financial assistance may be provided to a household for a purpose and time period supported by another public source.

Street Outreach

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless households; connecting them with emergency shelter, housing, or critical services; and providing urgent non-facility-based care to unsheltered homeless households who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Overview of Eligible Activities

- a) *Engagement*: The costs to locate, identify, and build relationships with unsheltered homeless people and engage them for the purposes of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
- b) *Case Management*: Includes the costs of assessing housing and service needs; arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants.
- c) *Emergency Health Services*: Includes costs for direct outpatient treatment of medical conditions provided by licensed medical professionals operating in community-based settings. Funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

- d) *Emergency Mental Health Services*: Includes costs for direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings. Funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.
- e) *Transportation*: Includes transportation costs of outreach workers, social workers, medical professionals, or other service providers provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible.

Emergency Shelter

Emergency shelter is defined as any appropriate facility that has the primary use of providing temporary or transitional shelter for the homeless in general or for specific populations of the homeless and the use of which does not require occupants to sign leases or occupancy agreements. ESG funds may be used to provide essential services to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters. Staff costs related to carrying out emergency shelter activities are also eligible.

Overview of Eligible Activities

- a) **Essential Services:**
 - a. *Case Management*: The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant.
 - b. *Child Care*: The cost of childcare for program participants is eligible. Children must be under the age of 13 unless they have a disability. Children with a disability must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates.
 - c. *Education Services*: When necessary for program participants to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible.
 - d. *Employment Assistance and Job Training*: The costs of employment assistance and job training programs are eligible.
 - e. *Outpatient Health Services*: Costs for direct outpatient treatment of medical conditions provided by licensed medical professionals. Funds may be used for these services only to the extent that other appropriate health services are unavailable within a community.
 - f. *Legal services* as set forth in subsection 576.102 (a) (1) (vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem which prohibits the program participant from obtaining or maintaining permanent housing.
 - g. *Life Skills Training*: Costs of 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, substance abuse, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community.
 - h. *Mental Health Services*: Costs include direct outpatient treatment provided by licensed professionals of mental health conditions. Funds may only be used for

these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

- i. *Substance Abuse Treatment Service*: Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. Funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within a community. Note: Inpatient detoxification and other inpatient drug or alcohol treatments are ineligible.
- j. *Transportation*: Costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.

b) Shelter Operations

- a. *Rent*
- b. *Security*
- c. *Insurance*
- d. *Utilities*
- e. *Food*
- f. *Furnishings & Supplies*
- g. *Maintenance*, including minor or routine repairs

Motel Vouchers

Where no appropriate emergency shelter is available for a homeless individual or family, eligible costs may include a hotel or motel voucher.

Renovation

For costs of rehabilitation, conversion or renovation to be eligible for payment with ESG funds, the building must be used for an emergency shelter for homeless families/individuals. A government entity or private non-profit organization must own the emergency shelter building before and after the renovation or rehabilitation. Buildings renovated with ESG funds as a shelter for homeless people are required to function as a shelter for a minimum period of time, depending on the type of renovation and the value of the building. See the table below. An agency may not rehabilitate, convert, or renovate a shelter or prospective shelter until HUD has performed an environmental review under 24 CFR part 50 and the agency has received HUD approval to continue. Please contact the ESG Program Manager if your program is considering this option.

Eligible costs include labor; materials; tools; and other costs for renovation, including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter.

Minimum Period of Use (*Regulatory Citation: 24 CFR § 576.102(i) Major rehabilitation*)

Rehabilitation and Renovation Minimum Period of Use		
	Use Requirement	Determining Criteria
Major Rehabilitation	10 years*	Rehab costs exceed 75% of the value of the building before rehabilitation.

Conversion	10 years*	Conversion costs exceed 75% of the value of the building after conversion.
Renovation, including rehab and conversion costs that do not meet 10 Year criteria.	3 years	Renovation costs are 75% or less of the value of the building before renovation.
*Recorded deed or use restriction required.		

Homelessness Management Information Systems (HMIS)

The HEARTH Act makes HMIS participation a statutory requirement for ESG-funded service providers. If the agency is a Victim Services Provider or Legal Services Provider, ESG funds may be used to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

Eligible Costs:

- a) Equipment & software
- b) Training & overhead
- c) HMIS participation fees
- d) Staffing

Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under HMIS.

Chapter 5: Client File Requirements

The requirements in this section must be followed and documented in client files.

Client Eligibility

Each client file must contain documentation that the household provided with assistance meets the eligibility requirements for the project type for which they are applying. For Rapid Re-Housing and Homelessness Prevention programs, verifications of homelessness and income verifications should be accompanied by third-party documentation. Self-certification of homelessness is sufficient for Street Outreach and Emergency Shelter services.

Component	Eligible Categories
Street Outreach	• Category 1 homeless – Literally Homeless • Must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter
Emergency Shelter	• Category 1 homeless – Literally Homeless • Category 2 homeless – Imminent Risk of Homeless • Category 3 homeless – Homeless Under Other Federal Statutes • Category 4 homeless – Fleeing/Attempting to Flee Domestic Violence
Homelessness Prevention	• Category 2 homeless – Imminent Risk of Homeless • Category 3 homeless – Homeless Under Other Federal Statutes • Category 4 homeless – Fleeing/Attempting to Flee Domestic Violence • At-Risk of Homelessness • Must have an annual income below 30% (ESG) or 60% (HPP) of county median income for the area at program entry
Rapid Re-Housing	• Category 1 homeless – Literally Homeless

Additional Requirements

- Funds cannot be targeted to clients from a specific agency.
- Assistance is limited to clients who meet the appropriate part of the homeless definition at program entry and where there is documentation of their homelessness.
- In the absence of source documentation or third-party documentation for rapid re-housing and homelessness prevention programs, the agency must certify that efforts were made to obtain the documentation.

Homeless Definitions	
Category 1: Literally Homeless	Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (1) Has a primary nighttime residence that is a public or private place not meant for human habitation; OR (2) Is living in a shelter designated to provide temporary living arrangements (including transitional housing and hotels/motels paid for by charitable or government organizations); OR (3) 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.
Category 2: Imminent Risk of Homelessness	Individual or family who will imminently lose their primary nighttime residence, provided that: (1) Primary residence will be lost within 14 days of the date of application for assistance; (2) No subsequent residence has been identified; AND (3) Household lacks the resources or support networks needed to obtain other permanent housing.
Category 3: Homeless under other Federal Statutes	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: (1) Are defined as homeless under one of the following: i. Section 387 of the Runaway and Homeless Youth Act; ii. Section 637 of the Head Start Act; iii. Section 41403 of the Violence Against Women Act of 1994; iv. Section 330(h) of the Public Health Service Act; v. Section 3 of the Food and Nutrition Act of 2008; vi. Section 17(b) of the Child Nutrition Act of 1966; vii. Section 725 of the McKinney-Vento Homeless Assistance Act; (2) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the assistance application; (3) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; AND (4) Can be expected to continue in such status for an extended period of time due to special needs or barriers
Category 4: Fleeing/Attempting to Flee Domestic Violence	Any individual or family who: (1) Is fleeing, or is attempting to flee, domestic violence; (2) Has no other residence; AND (3) Lacks the resources or support networks to obtain other permanent housing

At-Risk of Homelessness Definition

- | |
|--|
| <p>(1) An individual or family who:</p> <ul style="list-style-type: none"> i. Has an annual income below 30% of median family income for the area; and ii. Does not have sufficient resources or support networks immediately available to prevent them from becoming homeless; AND iii. Meets one of the following conditions: <ul style="list-style-type: none"> i) Has moved due to economic reasons 2 or more times during the 60 days immediately preceding the application for assistance ii) Is living in the home of another because of economic hardship; iii) Has been notified in writing that their current living situation will be terminated within 21 days; iv) Lives in a hotel/motel and is self-paying; v) Lives in a housing unit in which more than 1.5 persons reside per room; vi) Is exiting a publicly funded institution or system of care (such as a health-care facility, foster care, or correction institution); OR vii) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness. |
| <p>(2) A child or youth who qualifies as “homeless” under one of the following:</p> <ul style="list-style-type: none"> i. Section 387(3) of the Runaway and Homeless Youth Act ii. Section 637(11) of the Head Start Act iii. Section 41403(6) of the Violence Against Women Act of 1994 iv. Section 330(h)(5)(A) of the Public Health Service Act v. Section 3(m) of the Food and Nutrition Act of 2008 vi. Section 17(b)(15) of the Child Nutrition Act of 1966 |
| <p>(3) A child youth who qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth living with her or him</p> |

Homelessness Documentation Requirements	
Category 1: Literally Homeless	• Written observation by outreach worker or written referral by another service provider; <u>OR</u> • Self-certification by individual or head of household seeking assistance; <u>OR</u> • For individuals exiting an institution – one of the above <u>AND</u>: - o Discharge paperwork <u>or</u> written/oral referral <u>OR</u> - o Written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution.
Category 2: Imminent Risk of Homelessness	• A court order resulting from an eviction notice notifying the individual or family that they must leave; <u>OR</u> • For individuals and families leaving a hotel/motel – evidence they lack the financial resources to stay; <u>OR</u> • A documented and verified oral statement. <u>AND</u> • Certification that no subsequent residence has been identified and self-certification that the individual lacks the financial resources and support necessary to obtain permanent housing
Category 3: Homeless under other Federal Statutes	• Certification by a nonprofit or state/local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute <u>AND</u> • Certification of no permanent housing in last 60 days <u>AND</u> • Certification by the individual or head of household and any available supporting documentation that (s)he has moved two or more times in the past 60 days <u>AND</u> • Documentation of special needs <u>or</u> 2+ barriers
Category 4: Fleeing/Attempting to Flee Domestic Violence	• Statement by the individual or head of household seeking assistance stating: - o They are fleeing; - o No subsequent residence has been identified; <u>AND</u> - o They lack the financial resources and support networks to obtain other permanent housing. • Statement must be documented by a self-certification or a certification by an intake worker.
At-Risk of Homelessness	• Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing <u>AND</u> • Documentation of one of the eligibility conditions <u>OR</u> • Certification by a nonprofit or state/local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute

Evaluation of Need and Case Management

Any household provided with assistance must have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs. Any household provided with assistance for Homelessness Prevention or Rapid Re-Housing must comply with re-evaluation and case management requirements.

Initial Evaluation

- There must be an initial evaluation of all applicants to determine:
 - o Eligibility for ESG assistance
 - o Amount and type of assistance necessary for the household to regain stability in permanent housing

Homelessness Prevention and Rapid Re-housing

Re-Evaluations

- Re-evaluations are required for program participants receiving:
 - o Homeless Prevention assistance (not less than once every 3 months)
 - o Rapid Re-Housing assistance (not less than once per year)
- Re-evaluations are required to determine:
 - o Program participants' continued eligibility for assistance
 - o The amount and type of assistance needed by a household to retain stability in permanent housing
- To continue to be eligible for Rapid Re-Housing or Homelessness Prevention assistance, a household must:
 - o Have an annual income at or below 30% of CMI
 - o Lack sufficient resources and support networks to retain housing without ESG assistance

Case Management

- ESG-funded case management must comply with the applicable written standards and coordinated entry system.
- Program participants receiving ESG-funded case management must have contact with a case manager at least once a month.
- For program participants receiving ESG-funded case management, there must be a plan to assist the program participant in retaining permanent housing after the assistance ends.

Coordination with Homeless Services and Mainstream Resources

Sub-recipients must assist homeless individuals in obtaining permanent housing, appropriate supportive services, and other Federal, state, local, and private assistance available for such persons.

Sub-recipients should coordinate ESG-funded activities with other programs targeted to serving homeless households.

Habitability

The ESG Program establishes different habitability standards for emergency shelters and for permanent housing (rapid re-housing and homelessness prevention components). Sub-recipients must document compliance with the applicable standards.

1. Emergency Shelter Standards
 - a. Emergency shelters which receive ESG funds for renovation or shelter operations must meet the minimum standards for safety, sanitation, and privacy provided in §576.403(b)
 - b. In addition, emergency shelters which receive ESG funds for renovation (conversion, major rehabilitation, or other renovation) also must meet state or local government safety and sanitation standards, as applicable
2. Permanent Housing Standards.
 - a. Sub-recipient cannot use ESG funds to help a program participant remain in or move into housing which does not meet the minimum habitability standards under §576.403(c); this restriction applies to all activities under the Homelessness Prevention and Rapid Re-housing components

Rent Reasonableness and Fair Market Rent

Sub-recipients providing rental assistance must create policies and procedures in compliance with HUD regulations to ensure that all units meet fair market rent and rent reasonableness standards.

To calculate rent under this section, the unit's rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees), and, if the tenant pays separately for utilities, the monthly allowance for utilities established by the public housing authority for the area in which the housing is located.

Fair Market Rent

To establish whether a client's unit meets fair market rent standards, its rent must be compared to the fair market rent value for the unit's size and location. A unit's rent and utility allowance must together be at or below the fair market rent value for the area.

Fair market rent values are published annually by HUD. They may be found here:

<https://www.huduser.gov/portal/datasets/fmr.html>

Rent Reasonableness

Agencies must determine whether a unit's rent is reasonable in comparison to rent for other comparable unassisted units. To make this determination, the agency must consider:

- (1) The location, quality, size, unit type, and age of the contract unit; and
- (2) Any amenities, housing services, maintenance, and utilities to be provided by the owner per the lease.

To establish whether a unit meets rent reasonableness standards, it must be compared to at least two comparable units. Documentation of comparable units for a city or region must be updated at least annually. A sample "Rent Reasonableness Checklist and Certification" form is available at: <https://www.hudexchange.info/resource/2098/home-rent-reasonableness-checklist-and-certification/>.

Agencies must establish their own written policies and procedures for documenting comparable rents and ensure that they are followed when documenting rent reasonableness in case files. Policies must include a process for exceptional circumstances in the event the rent reasonableness standard cannot be met (accessibility, unit size, etc.).

See <https://www.hudexchange.info/resource/3070/esg-rent-reasonableness-and-fmr/> for additional guidance.

Lead Safety

Renovation: Any renovation carried out with ESG assistance shall be sufficient to ensure the building involved is lead-safe and sanitary. The requirements of rehabilitation differ according to the level of federal support.

Shelter: The facility must be free from lead-based paint contamination wherein clients may potentially stay for more than 100 days unless the facility is such that it is statutorily exempted.

Homelessness Prevention and Rapid Re-Housing: Every assisted unit must be free from lead-based paint contamination wherein that assistance lasts 100 days or more AND a child less than 6 years of age and/or a pregnant woman is expected to reside there. If these conditions are met and the unit was built before 1978, a visual inspection is necessary before assisting the unit in question.

Rent Assistance and Lease Standards

Standard Operating Procedure

1. Compliance with **Rent Reasonableness** and HUD **Fair Market Rent** as described above.
2. **Habitability Standards** apply for all units assisted with ESG monies.
3. **Lead-Based Paint** standards apply to all ESG funds in that a visual assessment is required for all units receiving assistance if the unit was constructed before 1978 and a child under 6 or a pregnant woman will live there.
4. There must be a **legally binding written lease** between tenant and landlord to receive ESG rental assistance.
 - a. Note that “master-leasing” is not allowed in ESG-funded programs, meaning that sub-recipients may not sign a lease and sublet the unit to a program participant.
5. There must be a **rental assistance agreement** between sub-recipient agencies and landlords. This can be between a property manager or owner and a sub-recipient. In ESG-funded programs, the agreement must contain VAWA protection requirements as provided under 24 CFR part 5, subpart L.
6. No ESG financial assistance can be provided to households receiving the same type of financial assistance from another *public* source for the same time period besides arrears. *Example: Persons living in public housing units, using housing choice vouchers,*

or residing in project-based assisted units cannot receive monthly rental assistance under ESG.

7. Late Payments
 - The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease
 - Sub-recipient must make timely payments to owners per the rental assistance agreement
 - Sub-recipient is solely responsible for paying with non-ESG funds any late payment penalties that it incurs
8. The total period for which any program participant may receive ESG services cannot exceed 24 months during any 3-year period. This includes arrearages.
9. Sub-recipients may set a maximum dollar amount and maximum period for which a program participant may receive any of the types of assistance or services based on program design and funding capacity, not to exceed 24 months.

Lease Requirements

The following rules apply whenever a client receives rental assistance under any project type.

1. Clients 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 unit owner and the client.
2. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the client 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.
3. Leases must include a provision or incorporate a lease addendum that includes all requirements that apply to tenants, landlords, and leases under 24 CFR Part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking) and 24 CFR § 576.409.
4. Leases are encouraged to have an initial term of one year. Leases may be renewed or extended as needed for as long as a client remains eligible. However, leases may never commit ESG funds beyond the current ESG contract's expenditure deadline or for ESG funds under a contract that has not yet been awarded.

Terminating Assistance

To terminate assistance to a program participant, the sub-recipient must establish and follow their formal process which meets all statutory requirements.

1. Sub-recipients may terminate ESG assistance if a participant violates the rules of the program.
 - a. Sub-recipients must establish and follow a formal process that recognizes individual rights.
2. This rule allows termination in only the most severe cases.
3. The termination process for rental assistance or housing relocation and stabilization services must include:

- a. Written notice to the program participant with a clear statement of the reasons for termination.
 - b. Review of the decision to terminate with an opportunity for the program participant to present written or oral objections to a third-party.
 - c. Prompt written notice to the program participant of the final decision.
4. Assistance to a program participant who has been terminated from a program may resume at a later date.
5. Only HUD may grant exceptions for ESG funds.
6. CDD may grant exceptions for HPP funds.

Housing Stability Plan

Sub-recipients which provide rapid re-housing, prevention, and emergency shelter services with a case management component must provide each household with a plan to either help them find and secure or maintain safe and stable housing. Program participants must be assisted in creating a plan which will help them obtain and retain permanent housing after the ESG assistance ends, taking into account all relevant considerations.

Housing Stability Case Management

ESG funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

- Using the centralized or coordinated assessment system to evaluate individuals and families applying for or receiving homelessness prevention or rapid rehousing assistance
- Conducting an initial evaluation, including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid rehousing assistance
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting re-evaluations

ESG Documentation Requirements

Sub-recipients will be responsible for demonstrating how each requirement for documentation is met, maintained, and monitored. Regardless of how the documentation is maintained, it must be consistent for each client within the project.

1. **Demonstration of intake** and basic assessment of needs and program eligibility.

2. **Homeless status or at-risk-of-homelessness status** which documents which part of the definition of homelessness a participant meets, and which has all the corresponding pieces of documentation.
3. **Annual income for homelessness prevention or rapid re-housing assistance** wherein there must be an income evaluation form and source documentation. In the absence of source documentation, there may be third-party verification and in the absence of third-party verification, there must be at least certification from the client.
 - a. Participants' income must be calculated according to HUD's Part 5 income definition
 - b. Income Limits and Verification Requirements
 - i. Income limits are established by household size and revised annually by HUD. Sub-recipients may charge households up to but not more than the maximum allowable rent.
 - ii. Income Limit at Admission (for Homelessness Prevention programs): Household Gross Annual Income must be at or below 30% (ESG) or 60% (HPP) of the median family income for the area, as determined by HUD.
4. **Re-evaluation** of income, other resources and support networks for homelessness prevention or rapid re-housing assistance which is documentation which occurs not less than once every three months for prevention and once annually for rapid re-housing. This is a re-evaluation showing whether annual income is still at an eligible level and whether the participant still lacks other resources or support networks to sustain housing without assistance.
 - a. Income Limit at Recertification (for Rapid Re-housing and Homelessness Prevention programs): Assistance must be terminated if a household's gross annual income exceeds 30% (ESG) or 60% (HPP) of the median family income for the area *at income recertification*. The beneficiary and property owner must receive thirty (30) days' written notice of termination.
5. **Type of service** refers to the amount and type of assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant.
6. **Termination procedure** documentation that demonstrates clients have been informed of their rights and of the procedure, and any correspondence related to a termination proceeding, if applicable.
7. Demonstration of **referral and connection** to homeless and mainstream services.
8. **Case-management** for prevention and re-housing participants which includes both demonstration of a monthly meeting and a housing stability plan.
9. **Rental assistance agreements and payments** which must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants and/or lease.
10. Documentation of compliance with **Fair Market Rent** and **Rent Reasonableness**.
11. **Housing standards** for homelessness prevention or rapid re-housing assistance must include documentation of compliance with housing standards in §576.403, including inspection reports. This requirement is met by the completed and signed Habitability Standards Checklist.

Chapter 6: Method of Payment

ESG Payment Request Forms

Sub-recipients may draw on ESG funds as reimbursement of actual reported expenditures. To initiate each payment, sub-recipients must complete and submit an invoice in the City's Contract URL invoicing system with completed Exhibit 2 (expenditure report) and Exhibit 3 (performance report). Payment requests must be made at least quarterly.

If corrections need to be made to the expenses reported in past months, do not edit the expenses which have already been submitted and reimbursed. Past omissions in reimbursable expenses or match can be added to the current month's column on the payment request. If previously reported expenses or match funds were reported incorrectly and need to be removed from the request, this correction can be made in the current month's column on the payment request. Those funds should be subtracted from any requested funds in the current month so all totals update accordingly. If a budget category would turn negative if the correction were to be entered in a single month's column, spread the negative funds across multiple payment requests.

Reporting Match

When entering match expenses on the payment request form, ensure all expenses fall into the proper category.

Budget Adjustments

If a sub-recipient's needs are different than anticipated and more funds need to be allocated to a different budget category, sub-recipients will need to complete a budget adjustment. Changes to the approved cost categories must be requested in writing to the contract manager. Adjustments cannot put an agency over its cap for administrative, outreach, or emergency shelter spending or below its minimum for rapid re-housing spending. Budget adjustments must be approved by the CDD Supervisor and must be approved prior to reimbursement of expenditures. Once an adjustment is approved, CDD will send a revised payment request form to sub-recipient.

ESG Program Income

Program income includes any amount of a security or utility deposit returned to a sub-recipient. No other program income is allowed to be derived from ESG. Sub-recipients are prohibited from requiring or suggesting repayment of any service or financial assistance except for security and utility deposits.

Program income must be used as ESG match and must be documented on the ESG Payment Request form. This means that the program income must be used for ESG-eligible expenses (e.g. expenses the agency may request reimbursement for on the ESG Payment Request Form). There must be an auditable trail that details how the program income was spent. Documentation of program income expenditures may be requested during monitoring visits.



DANE COUNTY WRITTEN STANDARDS 2026

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INTRODUCTION

The Continuum of Care (CoC) plans and coordinates a system of homeless housing and services in order to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the Continuum. The local CoC encompasses Madison and Dane County and is called the Homeless Services Consortium (HSC). These standards are intended to guide all operations that align with the HSC Community Plan to Prevent and End Homelessness

The Continuum of Care (CoC) and Emergency Solutions Grant (ESG) Program Interim Rules require recipients of ESG funds and CoCs to develop, in coordination with each other, written standards for administering assistance. All programs that receive CoC, ESG, and State of Wisconsin Emergency Solutions Grant/Housing Assistance Program/Homeless Prevention Program (EHH) must abide by the applicable sections of the standards in full. Programs funded through other sources are highly encouraged to follow these standards and may be required by the funders to comply with the standards. These standards do not replace policies and procedures created by homeless services providers, but rather they provide an overall context for programs funded with federal, state and local funding. The HSC acknowledges that the Written Standards are a HUD requirement and may be unintentionally exclusionary and welcomes feedback to explore how to standardize and improve the process of implementing the Community Plan to Prevent and End Homelessness. Feedback may be sent to hsc@cityofmadison.com.

The written standards will:

- Establish community-wide expectations on the operations of projects within the community;
- Ensure the system is transparent to users and operators; and
- Establish a minimum set of standards and expectations in terms of the quality expected of projects.

The first version of the written standards was developed by the HSC Written Standards Committee and approved by the HSC Board of Directors (Board) in consultation with ESG recipients in 2016. The standards are reviewed annually by the HSC Core Committee and recommended changes are approved by the Board.

In reviewing and updating the standards, the Core Committee uses the HSC listserv to invite HSC members to join the process. Recommendations for changes to the standards go out to the HSC for feedback and are presented to the HSC Board. The Board reviews and approves the standards. The Board meeting is open to the public and the agenda is publicly noticed, allowing opportunities for the public to provide input.

Changes made in the standards go into effect within 90 days of the Board approval of the changes, unless specified otherwise by the Board. The Board or the CoC Coordinator as designated by the Board is responsible for notifying the agencies receiving CoC, ESG, EHH, or other public funds that require compliance with the standards in writing.

The Board uses the written standards when evaluating program applications for the CoC, ESG and EHH funds. Programs that fail to abide by the standards may not be approved for future CoC, ESG, or EHH funding.

- CoC and ESG funded programs will complete the written standards checklist as a self-monitoring tool and submit to CoC Coordinator annually. CoC Coordinator will pass them onto the Board and appropriate funders.
- The Board designee for ESG, EHH, and CoC funds will use the written standards checklist to review compliance with the standards during monitoring. Programs found not in compliance with the standards must work with the funder or funding administrator to address the compliance issue within timeframe designated by the funder. Results of the written standards compliance monitoring and approved plans of correction will be shared with the Board upon funder's approval of plan of correction. In limited circumstances, a waiver may be requested to the Board if an agency cannot reasonably comply with the standards. The Board may grant or deny a waiver or choose to revise the standards.

If an agency disagrees with non-compliance finding with the standards, the agency may submit a written notice of appeal to the entity issuing the non-compliance finding within 30 days. The Board will make the final determination if the agency is in compliance with the standards.

The Board will use the agency self-monitoring and funder monitoring results regarding written standards compliance to inform strategy development (e.g. training, peer support, shared tool, etc.) to move the CoC towards increased compliance with the standards. The Board will facilitate training for any major changes in the standards.

If someone believes a project is in violation of the Written Standards, they are encouraged to first talk to the provider directly about the violation. If the situation is not resolved, they may reach out to the CoC Coordinator or the CoC Board of Directors to report the violation. The below process will be followed in response to a complaint:

1. The CoC Coordinator will document the complaint and conduct an initial investigation. The CoC Coordinator will communicate with both the person submitting the complaint and the agency to determine next steps.
2. The CoC Coordinator will notify the CoC Board and other funders of the program about the complaint and next steps. The Board will go into a closed session to discuss the complaint.
3. If warranted, the CoC Coordinator will further investigate the concern. At least one CoC Board Member will participate in the investigation. Additional stakeholders may be brought into the investigation as necessary and may include the HMIS lead, funders, etc. The CoC Coordinator and Board Member will determine whether or not the program is in violation of the Written Standards. If a violation has occurred, they will work with the agency to develop a plan and timeline for correction. The plan may include technical assistance, updates to policies and procedures, additional staff training, etc. The Board of Directors will be notified of the plan within 90 days.

4. Unresolved violations of the Written Standards will become a matter of record and may have bearing on funding decisions in future competitions as determined by the Board of Directors. The Board will go into closed session for discussions affecting funding.
5. Any further appeals will be made to the project funder.
6. The CoC Coordinator will keep records of concerns of Written Standards compliance, investigations, findings and correction plans to be shared with the CoC Board of Directors and relevant funding Review Committees.

In keeping with the goals and objectives of the Dane County “Community Plan to Prevent and End Homelessness,” all activities provided through the agencies of the Homeless Services Consortium should further the mission of preventing or ending homelessness for households in need.

In addition to the services provided by each agency, each program will play an active role in connecting participants to mainstream services, which are services not specifically designated for homeless households. All Consortium agencies agree to coordinate their services with other providers for the benefit of their participants. Examples of these programs include the Department of Housing and Urban Development (HUD) public housing programs, Section 8 tenant assistance, Supportive Housing for Persons with Disabilities, HOME, Temporary Assistance for Needy Families, Medicaid, Badger Care, public school districts, Head Start, Social Security, Social Security Disability, Social Security Disability Insurance, and Food Share.

SECTION I: GENERAL REQUIREMENTS

1. PROGRAM STANDARDS

1. In providing or arranging for housing, shelter or services, the program considers the needs of the household experiencing or at-risk of homelessness taking into account client choice.
2. The program provides assistance in accessing suitable housing.
3. The program is aligned with the community goals to prevent and end homelessness.
4. The Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), Vulnerability Index & Family Service Prioritization Decision Assistance Tool (VI-F-SPDAT), or Transition Age Youth-Vulnerability Index & Service Prioritization Decision Assistance Tool (TAY-VI-SPDAT) will be used when screening households for Permanent Supportive Housing and Rapid Re-housing programs. The latest version will be posted on the Homeless Services Consortium website.
5. Each shelter and housing case management program serving households with children must be aware of and inform households of the educational rights of children and unaccompanied youth in their programs, under the McKinney Vento Act. Program staff will facilitate the connection of households with their school's homeless liaisons, such as the MMSD Transition Education Program, to ensure seamless school enrollment and transportation arrangements. Program staff will highly encourage school attendance and will work with households and school staff to address any barriers to achieving academic success.
6. Each program in the CoC will provide accurate and up-to-date information on eligibility criteria ; e.g. – gender specific, individuals/families. Each agency will provide this information to the Coordinated Entry Manager.
7. Each housing and housing case management program in the CoC will use the Mainstream Benefits Checklist. This checklist should be kept in the file for each household and updated annually.
8. Each program will make language translation service available for clients when needed by utilizing available services, such as a language line.
9. All ES, TH, PSH, RRH, and other PH providers must provide information for Housing Inventory Chart (HIC) and Point in Time (PIT) as requested by the CoC or its designee.

2. CASE MANAGEMENT SERVICES

Core Principles

Case management is a necessary and important component in the work to prevent and end homelessness. Case managers are expected to have a strong philosophical base that informs their day-to-day interactions with participants. The Madison/Dane CoC requires projects to incorporate the following principles into their overall case management philosophy and maintain continued professional development in these competencies:

- **Housing First:** An approach to quickly connect households to permanent housing without preconditions and barriers to entry. Supportive services are offered to maximize housing stability and prevent returns to homelessness (see Housing First section).

- **Harm Reduction:** A set of practical strategies and ideas aimed at reducing negative consequences of substance use, mental and physical health issues, and risky behaviors. Focus on meeting people where they are at, avoiding judgment or ultimatums. Prioritize safety and well-being, while acknowledging individual choices and respecting autonomy.
- **Trauma-Informed Care:** An organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma. Staff approach interactions with sensitivity and understanding, recognizing the impact of trauma on a person's behavior and decision-making. There is an emphasis on physical, psychological, and emotional safety for participants and providers.
- **Client-Centered Approach:** All individuals are treated with dignity and respect. Empower individuals to define their own goals and take ownership of their journey. The case manager and participant work collaboratively to develop a personalized plan that addresses their unique needs and strengths.
- **Housing-Focused:** A service delivery approach that centers on securing and maintaining stable housing. This approach integrates intensive, personalized support to address barriers to housing and promote long-term stability. This includes developing self-advocacy and life skills, referral and connection to long-term supports, identification of support networks and resources and service coordination.
- **Progressive Engagement:** Monitor progress and adjust services as needed in collaboration with the participant. There will be times when a participant needs intense services and other times where they may need light-touch services.
- **Social Justice & Anti-Oppression:** Recognizes the systemic factors that contribute to homelessness, such as poverty, discrimination, and lack of affordable housing. Develop awareness of your own biases and intentionally work on unlearning harmful thoughts and behaviors. Be aware of and make referrals to culturally specific agencies and resources as appropriate. Acknowledge and address any barriers or challenges that may limit a participant's access or engagement, such as language, literacy, disability, stigma, or discrimination. Advocate for policies and practices that promote housing stability and social justice within organizations, communities, and society.

RISE Framework

Informed by the Lived Experience Council, the RISE framework offers actionable strategies that can help new case managers build meaningful connections and achieve positive outcomes in their work, even if they lack prior experience in homeless services. Integrating RISE into case management practices can enhance the effectiveness of support provided to individuals and families facing homelessness. **RISE:**

Respect, Inclusion, Support, and Empowerment

- **Respect:** Actively listen to clients' stories and validate their experiences. Acknowledge clients' autonomy by involving them in decision-making processes regarding their care and support.
- **Inclusion:** Create a welcoming environment that reflects the diversity of the community served, and ensure that services are accessible to all clients, regardless of background or circumstances.
- **Support:** Provide resources and tools tailored to the individual needs of clients, such as job training, mental health services, or financial literacy programs, while also providing consistent check-ins and follow-ups to encourage ongoing engagement and progress.
- **Empowerment:** Facilitate skill-building workshops that help clients gain confidence and independence, and encourage clients to set their own goals and celebrate their achievements, no matter how small.

Professional development should extend beyond orientation and include:

- **Supervision:** Regular, structured feedback from a supervisor, including performance reviews
- **Continuing Education:** Attending meetings and trainings on topics and resources relevant to case management and homeless issues, earning certifications as appropriate
- **Networking:** Participating in the work of the Homeless Services Consortium, attending meetings or events with organizations that intersect with homeless services, building partnerships

Participant Engagement & Support

Effective case management relies on trust and collaboration. Participants may not initially be interested in services, but consistent, respectful engagement can build relationships and open the door to support.

Engagement

- Use a non-judgmental and empathetic approach.
- Engage participants in familiar and safe locations when initiating contact.
- Use assertive engagement. This is an active approach that is persistent and friendly. Staff should work to find creative ways to engage with the participant.
- Communicate in a variety of ways: phone, mail, text, email, in-person meetings in home or community, etc.
- Build trust through consistent and respectful interactions.
- Set realistic expectations, only commit to what can be delivered, and ensure consistent follow-through on commitments.
- Listen actively to understand the participant's story and priorities.
- Use motivational interviewing to increase engagement with the program.
- Establish clear boundaries and expectations for services. Ensure that participants understand expectations.
- Acknowledge and validate participants' feelings and experiences.
- Empower participants to make informed decisions about their care.

Ongoing Support

- Maintain regular, predictable contact based on the participant's preferences. Appointment-based work may not work for everyone.
- Staff must continue to engage with participants and have conversations to determine what support the participant has interest in.
- Provide a menu of services so participants know what services are available.
- Use progressive engagement. Monitor progress and adjust services as needed in collaboration with the participant. There will be times when a participant needs intense services and other times where they may need light-touch services.
- Offer advocacy to help participants navigate system barriers.

Assessment & Goal Planning

Assessment and evaluation of a participant's needs, strengths and challenges is an ongoing process that occurs both formally and informally. Case managers will be assessing a participant's well-being, housing stability, and progress toward identified goals in every interaction.

- Conduct an initial assessment within 30 days of enrollment to identify needs, strengths, and barriers.
- Collaboratively develop an individualized housing and service plan based on the initial assessment, with meaningful goals broken down into manageable steps.
- Review and update the plan regularly based on progress and changing circumstances.

The Individual Housing and Service Plan should incorporate:

- **Housing Consultation:** Reduce barriers, identify housing options, assist with applications, and advocate for participant needs.
- **Unit Affordability & Income:** Ensure housing is sustainable based on income. Support participants in increasing income through work, alternative opportunities (e.g., babysitting, lawn mowing), or mainstream benefits.
- **Exit Planning:** For time-limited programs, begin planning for exit early, with goals focused on long-term stability and warm handoffs to ongoing support.
- **Maintaining Housing:** Help participants develop skills in budgeting, lease compliance, and conflict resolution, and connect them to ongoing housing stability services.
- **Safety & Crisis Planning:** Identify risks, develop harm reduction strategies, and connect participants to appropriate resources to ensure safety in housing or unsheltered situations.

By prioritizing empowerment and self-advocacy in the assessment and goal planning process, case managers help participants feel more engaged, motivated, and confident in working toward their goals. This inclusive, respectful approach honors each individual's lived experience and supports their long-term growth and stability. Examples of assessment and goal planning tools are available on the [HSC website](#).

Service Coordination

Service coordination is essential in case management as it ensures that participants receive comprehensive and personalized support. Staff should collaborate with all service providers that the participant is working with in order to address the needs of the participant and avoid duplication of services.

Service providers will develop a thorough understanding and gain knowledge about community resources by actively researching local guides and participating in HSC meetings. Providers are highly encouraged to seek out knowledge from other colleagues, case managers, and those with lived experience to become more familiar with the homeless system of care.

Service coordination is particularly important when engaging in a warm handoff. When a participant moves from one service provider to another, the minimum expectation is for the providers to communicate about the participant's individualized service plan and progress on goals. Best practice includes a meeting with both providers and the participant to discuss their service plan.

Staff who attend case conferencing meetings must sign and adhere to the [Homeless Services Consortium of Dane County Case Conferencing Agreement](#).

Provider directories and resources are available on the [HSC website](#).

Property Owner & Manager Engagement

It is important for housing program staff to understand both the needs of program participants and the needs of property owners and managers. Building relationships with property owners/managers fosters regular dialogue about participants and their tenancy.

Case managers can support property owners/managers by maintaining consistent, responsive communication, which builds collaboration, strengthens trust, and helps identify interventions to support participants' housing stability.

Engagement with property owners and managers should incorporate:

- **Defined Roles:** Be clear, concise, and put into writing the roles and expectations for all parties. There should be understanding regarding the needs of the rental business, housing program, and tenant/program participant. Be clear about what case management can and cannot do.
- **Communication:** Open, consistent communication builds trust and fosters ongoing partnerships with property owners/managers.
 - Establish regular monthly check-ins by phone, virtual, or in-person, even when no issues arise.
 - Respond promptly to property owner/manager contacts.
 - Proactively reach out as soon as concerns emerge, before tenancy is at risk.
 - Document all communication and share with relevant parties.
 - Designate a primary and backup contact to ensure timely responses.
- **Support:** Become familiar with third-party mediation services to help resolve conflicts between tenants and property managers.

Documentation

Upon program entry, the case manager must create a hard copy and/or electronic participant file that includes all of the following at minimum:

- Enrollment in HMIS or equivalent database
- Any required eligibility documentation
- Needs assessment
- Documentation of services provided/case notes

Files must also include all required documentation specific to their program type or funding source, which may include:

- Release of Information (ROI) forms
- Mainstream resource checklist
- Housing stability/service plan
- Status updates and annual assessments
- Housing documents (e.g., lease, rental assistance agreement, VAWA, FMR, rent reasonableness, inspections, lead paint disclosure, etc.)
- Documentation of other assistance provided (e.g., rental assistance, transportation assistance, etc.)
- Grievance/appeal procedure
- Termination procedure
- Discharge Summary

Case managers are responsible for knowing what documentation is required for their individual program type and/or funding source, and ensuring that documentation is included in each participant file. Program staff are encouraged to utilize existing participant file checklists that are specific to their program type or funding source, or to create a file checklist that includes all required documentation.

Data must be recorded in HMIS on a consistent and timely basis and staff should strive for real-time, or close to real-time data entry. Staff are required to complete data entry within six (6) calendar days of seeing a participant, but encouraged to enter data immediately. Real-time data entry allows for accurate program and system reporting, as well as collaboration between providers.

Participant files should be stored, shared, and destroyed in accordance with CoC Recordkeeping Requirements (see Section 1:8).

Case Notes

- Case notes create a record of interactions with and services provided to program participants, as well as unsuccessful attempts to engage.
- Effective case notes are objective, concise, and include both progress and next steps for working with participants.
- Case notes should include only relevant information and be clear enough to be read and understood by colleagues, supervisors, funders, and program participants themselves.
- Case notes can be used in legal proceedings.
- Case notes should be fact-based and include the reason for the meeting, reports from the participant, objective observations by staff, progress made toward goals, resources or services provided, and next steps to be completed by staff and/or the participant.
- Staff should use professional language and avoid making assumptions, sharing opinions, or using acronyms, slang, or jargon.

Professional Development

To effectively serve households experiencing homelessness, case managers are expected to be trained in several core competencies, as well as evolving best practices. Recommended core competencies include:

- **Understanding Homelessness:** Causes, impacts, systems, and policies related to homelessness
- **Trauma-Informed Care:** Prevalence of trauma, implementing trauma-informed approaches
- **Crisis Intervention:** Identifying and responding to crisis, de-escalation, resources and referrals
- **Housing First:** Understanding the principles and benefits of housing first and harm reduction practices
- **Community Resources:** Identifying relevant resources, collaborating with partners, advocacy
- **Cultural Competency:** Understanding diverse cultural backgrounds, communicating effectively, addressing barriers to service access
- **Case Management Skills:** Assessments, individualized housing and service plans, motivational interviewing
- **Ethical Considerations:** Professional standards, confidentiality, boundaries, conflicts of interest

Ending Case Management Services

Whenever possible, case management services should end in a way that supports the participant's well-being and long-term stability. Ending case management services may look different depending on

project type, length of engagement, or circumstances of discharge. In all cases, it is staff's responsibility to end services with as much communication and transition support as the situation allows.

Criteria for Ending Services

- **Service Completion:** Participant has secured stable housing and demonstrated the ability to maintain it with minimal or no ongoing case management support and/or has met the goals outlined in their individualized housing and service plan.
- **Participant-Driven Exit:** Participant chooses to disengage from services or expresses that they no longer need or want case management support.
- **Transition to Other Supports:** Participant is connected to alternative, long-term support services (e.g., behavioral health services, disability services, employment programs) that better meet their ongoing needs.
- **Program Eligibility Ends:** Participant is no longer eligible for the program due to funding restrictions, time limits, change in household composition, or other programmatic constraints. A transition plan should be developed proactively in such cases.
- **Lack of Engagement After Due Diligence:** Participant has not engaged with services despite multiple documented outreach attempts (e.g., phone calls, texts, emails, home visits). A formal closure notice should be provided whenever possible.
- **Program Discharge:** Participant is automatically exited from a shelter or outreach program after 60 days with no contact. If the participant re-enrolls, services may resume.

Due Diligence in Ending Services

- **Clear Communication:** Explain the reason for closure in a supportive, transparent way.
- **Warm Handoff:** Whenever possible, connect the participant to ongoing supports.
- **Exit Planning:** Offer a final meeting to review housing stability, resources, and emergency contacts.
- **Documentation:** Record the reason for closure, outreach attempts, and referrals provided.

3. PERSONNEL

All programs shall be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

MINIMUM STANDARDS

1. The agency selects, for its service staff, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
2. The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
3. All paid and volunteer service staff participates in ongoing and/or external training and development to further enhance their knowledge and ability to work with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability. Examples of training topics include, but are not limited to, harm reduction, trauma informed care, housing first and racial justice.

4. For programs that use HMIS, all HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. Agency staff with responsibilities for supervision of the casework, counseling, and/or case management components have, at a minimum, a bachelor's degree in a human service-related field and/or experience working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
6. Staff with supervisory responsibilities for overall program operations shall have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
7. All staff has a written job description that, at a minimum, addresses the major tasks to be performed and the qualifications required for the position.
8. The program operates under affirmative action and civil rights compliance plans or letters of assurance.
9. Case supervisors review current cases and individual service plans on a regular and consistent basis to ensure quality, coordinated services.

4. HOUSING FIRST

Housing First is a proven method of ending all types of homelessness, and is the most effective approach to ending chronic homelessness. Housing First offers individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing, without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low-threshold for entry. Housing First permanent supportive housing models are typically designed for individuals or families who have complex service needs, who are often turned away from other affordable housing settings, and/or who are the least likely to be able to proactively seek and obtain housing on their own. Housing First approaches for rapid re-housing provide quick access to permanent housing through interim rental assistance and supportive services on a time-limited basis. Rapid re-housing programs are designed to have low barriers for program admission, and to serve individuals and families without consideration of past rental, credit or financial history. The Housing First approach has also evolved to encompass a community-level orientation to ending homelessness in which barriers to housing entry are removed and efforts are in place to prioritize the most vulnerable and high-need people for housing assistance.

SYSTEM-WIDE HOUSING FIRST ORIENTATION FOR THE HOMELESS SERVICES CONSORTIUM

- Emergency shelter, street outreach providers, and other parts of crisis response system are aligned with Housing First and recognize their roles to encompass housing advocacy and rapid connection to permanent housing. Staff in crisis response system services operate under the philosophy that all people experiencing homelessness are housing ready.
- Strong and direct referral linkages and relationships exist between crisis response system (emergency shelters, street outreach, etc.) and rapid re-housing and permanent supportive housing. Crisis response providers are aware and trained in how to assist people experiencing homelessness to apply for and obtain permanent housing.

- The HSC has a streamlined and user-friendly community-wide process for applying for rapid re-housing, permanent supportive housing and/or other housing interventions. The process includes the use of standardized eligibility forms.
- The HSC has a coordinated entry system for matching people experiencing homelessness to the most appropriate housing and services based on participant choices.
- The HSC has a data-driven approach to prioritizing highest need cases for housing assistance whether through analysis of lengths of stay in Homeless Management Information Systems, vulnerability indices, or data on utilization of crisis services.
- Policymakers, funders, and providers collaboratively conduct planning and raise and align resources to increase the availability of affordable and supportive housing and to ensure that a range of affordable and supportive housing options and models are available to maximize housing choice among people experiencing homelessness.
- Policies and regulations related to permanent supportive housing, social and health services, benefit and entitlement programs, and other essential services, support and do not inhibit the implementation of the Housing First approach. For instance, eligibility and screening policies for benefit and entitlement programs or housing do not require the completion of treatment or achievement of sobriety as a prerequisite.

MINIMUM STANDARDS

1. Program admission/tenant screening and selection practices promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.
2. Applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that indicate a lack of “housing readiness.” Although applicants may be rejected due to convictions for violent criminal activity, agencies will make all effort possible to remove barriers to program enrollment. A rejection is only appropriate when an applicant presents a direct threat to the health and safety of program staff and residents and that threat cannot be ameliorated.
3. Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy. Rapid re-housing programs may require case management as condition of receiving rental assistance as required by state or federal funding.
4. Use of alcohol or drugs in and of itself (without other lease violations) is not considered a reason for eviction. Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants’ lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.
5. If a participant’s tenancy is in jeopardy, every effort is made to offer a transfer to a tenant from one housing situation to another. Whenever possible, eviction back into homelessness is avoided. If unavoidable, every effort is made to connect the participant with outreach or other housing support services.

6. Tenant selection plan for permanent housing includes a prioritization of eligible tenants based on criteria other than “first come/first serve” such as duration/chronicity of homelessness, vulnerability, or high utilization of crisis services.
7. Tenants in permanent housing are given reasonable flexibility in paying their tenant share of rent (after subsidy) on time and are offered special payment arrangements (e.g. a payment plan) for rent arrears and/or assistance with financial management including representative payee arrangements.

RECOMMENDED PROGRAM PRACTICES

1. Tenants are not required to have income for program eligibility.
2. Case managers/service coordinators are trained in and actively employ evidence-based and best practices for client/tenant engagement such as Motivational Interviewing (MI), Critical Time Intervention (CTI), client-centered care, and trauma-informed care. Agencies are recommended to participate in any trainings provided by the HSC.
3. Building and apartment units may include special physical features that accommodate disabilities, reduce harm, and promote health among tenants. These may include elevators, stovetops with automatic shut-offs, wall-mounted emergency pull-cords, ADA wheelchair compliant showers, soundproofing cushions, etc.
4. In the event a provider seeks to terminate services and/or evict a program participant, a notice of termination shall include information of local legal services providers.

PROGRAM EVALUATION FOR HOUSING FIRST¹

In an effort to move to a system-wide orientation to ending homelessness through the use of Housing First principles, the HSC has included the following section to review agency and program adoption of Housing First. Agencies and programs should follow the guidelines below. The guidelines have been created to minimize as many barriers to housing as possible, recognizing that this may not be feasible under all circumstances. In some cases, there may be other entities, including, but not limited to, private landlords, the criminal justice system, and funders, that place additional tenant requirements upon program participants. The HSC Board will conduct an annual Housing First evaluation to inform funding decisions.

The guidelines set forth under this section have been created by the HSC in an effort to promote agency-to-agency review and technical assistance within the HSC for all community programs. All review conducted under this section will be conducted internally by the HSC.

1. Does the project provide and explain the written eligibility criteria, which are in line with the Housing First philosophy, to participants?
2. Does the project have admission/tenant screening and selection practices that promote the acceptance of applicants regardless of their sobriety, use of substances, completion of treatment, or participation in services?
3. Does the project accept participants who are diagnosed with or show symptoms of a mental illness?

¹ Program Evaluation taken from:

<http://www.allchicago.org/sites/allchicago.org/files/2015%20Project%20Component%20-%20FINAL.pdf>

4. Does the project have and follow a written policy for the following:
 - a. Stating that taking psychiatric medication and/or treatment compliance for mental illness is not a requirement for entry into or continued participation in the project?
 - b. Not rejecting participants based on previous criminal history that is not relevant to participation in the program, and accepting participants regardless of minor criminal convictions to the project?
 - c. Not rejecting participants based on prior rental history or past evictions to the project?
 - d. Accepting participants regardless of lack of financial resources to the project, unless program operation is dependent upon participant income?
 - e. Accepting participants regardless of past non-violent rule infractions within the agency's own program and/or in other previous housing programs to the project?
5. Upon entry to the project, the project agrees to allow participants to remain in the project even if they require an absence of 90 days or less due to the reasons outlined below, unless otherwise prohibited by law or funder policy:
 - a. Substance use treatment intervention
 - b. Mental health treatment intervention
 - c. Hospitalization and short-term rehabilitation
 - d. Incarceration
 - e. Or other reason approved by the program supervisor

5. EMERGENCY TRANSFER PLAN

The Continuum of Care is required to have an Emergency Transfer Plan in place in cases of domestic violence, dating violence, sexual assault, or stalking where a household deems their current unit an unsafe living situation. A victim may request an emergency transfer from their current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. Providers shall make their plan available upon request and publicly post the Emergency Transfer Plan on its website and in a conspicuous location on its premises 24 CFR 5.2005 (e)(11).

ELIGIBILITY CRITERIA

- A victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if: 24 CFR 5.2005(e)(2)
 - The tenant requests the transfer; and
 - The tenant believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or
 - In cases of sexual assault when:
 - the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains in their current unit, or
 - the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.
- Requests for an emergency transfer can be either written or verbal. If a verbal request is made, staff shall document the request in writing.
- In cases of two-adult households where the participant asked to leave was the eligible participant for the housing program, the remaining participant(s) who were not already eligible will have a period of 90 calendar days from the date of the eligible participant leaving to:

- Establish eligibility for the housing program
- Establish eligibility for another housing program
- If not eligible for a housing program, a provider or agency will assist with finding alternative housing.

Agencies may extend this period up to an additional 60 calendar days if needed. Case management staff will help to obtain documentation. The provider shall give written notice to the remaining participant of the remaining participant's rights under this section, including the right to an extension. Denials of extensions shall be subject to the provider's grievance process. 24 CFR 5.2009

- For permanent supportive housing projects, members of any household who were living in an assisted unit at the time of a qualifying member's eviction from the unit because the qualifying member was found to have engaged in criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking, have the right to rental assistance until the expiration of the lease in effect at the time of the qualifying member's eviction. 24 CFR 578.75(j)
- Although every effort will be made to keep the person requesting the emergency transfer in the program, there is no guarantee that continued assistance will be available in the current program or in other program housing.

MINIMUM STANDARDS

1. Persons may not be denied assistance, terminated from assistance or evicted as a result directly related to experiencing domestic violence, dating violence, sexual assault, or stalking, regardless of sex, gender identity, gender expression or actual or perceived sexual orientation, if the person otherwise qualifies for the project. 24 CFR 5.2005(b)(1)
2. Program participants may not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking if:
 - a. The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and
 - b. The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking. (24 CFR 5.2005(b)(2)
3. The Notice of Occupancy Rights under the Violence Against Women Act (HUD Form 5380) and Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation (HUD Form 5382) must be provided to program applicants/participants (in the language they request) when they are accepted or denied transitional or permanent housing, served an eviction notice or terminated from assistance. CoC and ESG program grantees must document that participants were informed of their rights and provided copies of the notices. A signed copy of acknowledgement must be maintained in client files. If person refuses or is unable to sign, provider will document provision of forms and attempt to get signature. For applicants who do not become participants, providers must keep files of signed documents for three years. 24 CFR 5.2005 (a)(1)(2)(3)
4. When a housing provider is entering into a lease agreement with a participant, they must include the VAWA Lease Addendum (HUD Form 91067) which is to be signed by both the tenant and the housing provider.
5. CoC and ESG-funded programs using funds for rental assistance are required to include VAWA notification and confidentiality requirements in a contract with the owner or manager of the housing unit(s). The program must ensure that the owner or manager of the housing provides

HUD forms 5380 and 5382 to the program participant with any notification of eviction. (24 CFR 578.99(j) (4)(5))

6. All information regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is or has experienced such violence or staking, must be kept confidential. This includes keeping confidential the new location of the unit of the program participant. Confidentiality also means that providers and/or property owners or managers may not:
 - a. Enter the information into any shared database except the authorized DV comparable database;
 - b. Allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work; or
 - c. Provide the information to any other entity or individual, except to the extent that the disclosure is:
 - i. Requested or consented by the individual, in writing stating permission to release the information on a time-limited basis;
 - ii. Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or
 - iii. Otherwise required by applicable law
 - d. If program disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the program will inform the victim before disclosure occurs so that safety risks can be identified and addressed. 24 CFR 5.2005 (e)(4)
7. Upon request for an emergency transfer, the housing provider must establish an individualized plan with the tenant and provide a copy of the plan to the tenant in writing. The housing provider will offer to assist participants in contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.
8. Program staff must complete an immediate initial emergency transfer if a safe unit can be identified. The participant will move to the new unit without having to undergo an application process. Program staff will assist participants in planning for the move and establishing residency in new location. 24 CFR 5.2005(e)(5)(6)
9. If a participant must move outside of the current project to locate a safe unit, the program staff must communicate with the Coordinated Entry Manager to complete an external emergency transfer. The participant will move to another unit as soon as a unit is identified as available, and on its face, it appears that the tenant is eligible. The applicant will subsequently undergo an application process in order to establish permanent residency in the new unit. 24 CFR 5.2005 (e)(7)
10. Program participants requesting an emergency transfer will be prioritized above any other households for open units. 24 CFR 5.2005 (e)(3)
11. The program participant will make a decision on whether or not a unit qualifies as a safe unit.
12. Program participants may request an external emergency transfer. Participants may also request both an internal and external transfer at the same time in order to speed up the process of identifying a new unit. 24 CFR 5.2005(e)(7)(8)
13. Agencies participating in Coordinated Entry must accept emergency transfers as they have available units that are deemed safe. 24 CFR 5.2005(e)(7)
14. Program staff will work together to ensure a timely transfer to a new safe unit, ideally within 60 days. If needed, the participant may seek shelter while a permanent safe unit is being secured.

15. For families receiving tenant-based rental assistance, if the family separates in order to affect an emergency transfer, the housing provider must work with the members requesting a transfer to locate new housing *and* with the family members exiting from the program on housing stability. This may include working with the landlord so the family can stay in the unit or work towards a mutual lease termination. The housing provider will conduct a housing search with the family members for 90 days and if not housed, connect to another provider for ongoing assistance. 24 CFR 5.2005(e)(9)
16. **Housing providers are not required to request documentation.** However, the housing provider, at its discretion, may make a written request for documentation from the tenant of the occurrence of domestic violence, dating violence, sexual assault, or stalking for which the emergency transfer is requested. Housing provider's policies must include their policy for requesting documentation, if they choose to request documentation. The policy must be consistent with these standards and equally applied to all participants. Should the housing provider exercise its discretion to request documentation, it shall do so in writing. The written request shall inform the tenant of the types of additional documentation that may be provided, any one of which would be acceptable, and the period of time by which the documentation is to be provided. The period of time shall be no less than 14 days and may be extended by the provider. This documentation may include:
- a. Certification Form (see Appendix)
 - b. A document:
 - i. Signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking or the effects of abuse;
 - ii. Signed by the applicant or tenant; and
 - iii. That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking (see glossary); or
 - c. A record of a Federal, State, tribal or territorial or local law enforcement agency, court or administrative agency; or
 - d. A statement or other evidence provided by the applicant or tenant.

If the housing provider receives documentation that contains conflicting information, the housing provider may require third-party documentation be obtained within thirty days of the request for third-party documentation. Conflicting information cannot be the result of the housing provider's own personal biases or stereotypes about survivors. The housing provider may deny the emergency transfer request if documentation has not been provided. Participants are entitled to written notice of denials of emergency transfer requests that include specific grounds for denial, information on their right to grieve the denial, and a copy of the grievance process. 24 CFR 5.2007

17. Housing providers cannot place a limit on the number of emergency transfer requests made by a participant.
18. Housing providers must keep a record of all emergency transfers requested under this plan and the outcomes of such requests, and retain these records for a period of three years, or for a

period of time specified in program regulations. Requests and outcomes of such requests must be reported to HUD and the CoC Board of Directors annually. 24 CFR 5.2005(e)(12)

6. TERMINATION AND GRIEVANCE PROCEDURES

MINIMUM STANDARDS

1. Programs should terminate assistance only in the most severe cases, utilizing the housing first philosophy.
2. All agencies providing services with CoC and ESG funds shall be required to have a termination and grievance policy. Policies must allow an applicant to formally dispute an agency decision on eligibility to receive assistance. The policy must include the method an applicant would be made aware of the agency's grievance procedure and the formal process for review and resolution of the grievance.
3. All agencies must have policies that allow a program participant to formally dispute an agency decision to *terminate assistance*. The policy must include the method that a written notice would be provided containing clear statement of reason(s) for termination, which shall include a detailed statement of facts, the source of the information upon which it was based, and the participant's right to advance review of the agency's file and all evidence upon which the decision was based; a review of the decision in which the program participant is given the opportunity to present evidence (written or orally) 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 program participant. The agency has the burden to prove the basis for their decision by a preponderance of the evidence. The decision shall not be based solely on hearsay.
4. If an agency has a website, they must publicly post their termination and grievance procedures.
5. See the Emergency Shelter section for details on how these programs should handle termination and grievances.
6. Nothing in this section shall prevent an agency from reinstating services pursuant to applicable law.

7. PROGRAM TRANSFER

MINIMUM STANDARDS

1. Permanent Supportive Housing and Rapid Rehousing programs may consider transferring a program participant to another program for the reasons listed below. Approved transfer requests will be prioritized for program openings using the following order of prioritization:
 - i. Emergency transfer requests (VAWA)
 - ii. ADA requests for an accessible unit
 - iii. Changes in household composition
 - iv. Within 60 days of program termination (participant closest to program termination will be prioritized within this category)
2. Transfers are not guaranteed. Transfers may be limited by the availability of permanent housing placement options and the funding and program eligibility requirements of the program accepting the transfer request. For example, evidence of chronic homelessness prior to enrollment in the transferring housing program may be required for eligibility into the accepting housing program. Additionally, not all RRH programs are allowed to accept transfer requests per the limitations of the program funding requirements.

3. To initiate a program transfer, housing program staff must complete a Transfer Request Form (Appendix E) and submit it to the Coordinated Entry Manager. If applicable, chronic homeless documentation must also be submitted. Requests will be reviewed to determine if they fall under one of the allowable reasons listed above.
4. Approved transfer requests will be added to a list maintained by the Coordinated Entry Manager. Requests will remain active on the Transfer Request List for a period of 90 days, at which time the transferring housing program must submit a new Transfer Request Form to the Coordinated Entry Manager. If a new form is not received, the participant will be removed from the Transfer Request List and will no longer be considered for a program transfer.

8. RECORD KEEPING REQUIREMENTS

Agencies are responsible for knowing the reporting requirements for each funder and program. Documentation for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

MINIMUM STANDARDS

1. Each participant file should contain, at a minimum, information required by funders, participation agreements and/or signed lease agreements, service plans, case notes, information on services provided both directly and through referral and any follow-up and evaluation data that are compiled.
2. When required by funders, client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur.
3. Financial recordkeeping requirements include documentation of: all costs charged to the grant, funds being spent on allowable costs, the receipt and use of program income, compliance with expenditure limits and deadlines and match contributions.
4. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law. Participants must give informed consent to release any client identifying data to be utilized for research, teaching and public interpretation.
5. Files must be saved for a minimum of six years after program discharge. It should be noted that different funders may have different record keeping requirements.

9. USE OF SOCIAL MEDIA

Case managers should exercise caution when using social media for personal or professional purposes. In addition to the guidelines below, case managers should be aware of and adhere to their own agency's policies regarding use of personal and professional social media accounts.

Personal Use

- Keep personal and professional accounts separate.

- Do not connect with participants on personal accounts.
- Never post information that could identify participants.
- Maintain boundaries to protect confidentiality and professionalism.

Professional Use

- Organizations may authorize professional accounts for outreach or engagement.
- Maintain strict confidentiality: never share names, locations, or identifiable details.
- Obtain explicit, documented consent before sharing any participant stories or images.
- Use professional accounts only as a supplement to – not a replacement for – direct engagement methods.

SECTION II: PROGRAM REQUIREMENTS

1. PREVENTION

Homelessness prevention assistance includes rental assistance and housing relocation and stabilization services necessary to prevent an individual or family from moving into an emergency shelter, the streets, or a place not meant for human habitation.

ELIGIBILITY CRITERIA

- Participants must meet one of the following categories of HUD's Homeless Definition under CFR §576.2, AND have an annual income at or below 30% of the county median income:
 - Category 2* (Imminent Risk of Homelessness)
 - Category 3 (Homeless Under Other Federal Statutes)
 - Category 4* (Fleeing/Attempting to Flee Violence, and not living in a place described in Category 1)

*Category 2 and category 4 participants must have no other residence AND lack the resources and support networks to obtain other permanent housing.

OR

Individuals and families who do not meet the definition of "homeless" under any of the categories established in the HUD Homeless Definition final rule, and are "at risk of homelessness" under the McKinney-Vento Act, may receive homeless prevention assistance.

- Participants must meet one of the three categories of HUD's At Risk of Homelessness Definition under CFR §576.2, AND have an annual income at or below 30% of county median income:
 - Category 1: An individual or family who:
 - Has an annual income below 30% of median family income for the area; AND
 - Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
 - Meets one of the following conditions:
 - Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - Is living in the home of another because of economic hardship; OR
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
 - Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
 - Is exiting a publicly funded institution or system of care; OR

- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
- Category 2 (Children/youth who do not qualify as homeless under the homeless definition in §576.2 but qualify as homeless under another Federal statute)
- Category 3 (Children/youth and their families who do not qualify as homeless under the homeless definition in §576.2, but who do qualify as homeless under Section 725(2) of the McKinney-Vento Homeless Assistance Act)

PARTICIPANT PRIORITIZATION REQUIREMENTS FOR FINANCIAL ASSISTANCE

- All individuals and families must meet the minimum HUD requirements for eligibility for homeless prevention. Further, all participants must have experienced homelessness in an emergency shelter, safe haven or place not meant for human habitation at some point in their lives.

The HSC will use a shared prioritization scoring tool (see Appendix C) that will target participants with the most barriers to housing. This tool will be used for individuals and households that meet the initial eligibility requirements listed above. Participants with the highest score at the end of an agency's intake period will be prioritized to receive financial assistance.

Program participants requesting an emergency transfer will be prioritized above any other households for open units. 24 CFR 5.2005(e)(3)

PARTICIPANT PRIORITIZATION REQUIREMENTS FOR PREVENTION SERVICES

- Agencies providing ESG or HPP-funded prevention services not tied to financial assistance must take referrals of eligible households from the Coordinated Entry prevention hub. Agencies may also take direct referrals from eligible households.
- If services cannot be provided to all eligible households requesting the services, the agency offering the services must administer the shared prioritization scoring tool (Appendix C) used for prevention financial assistance in order to determine who should be prioritized to receive services.
- Entities that conduct program monitoring must have protocols to review the referral and prioritization process to ensure agencies are either able to provide services to all eligible households or using the prioritization scoring tool to determine service priority.
- Program participants requesting an emergency transfer will be prioritized above any other households for open units. 24 CFR 5.2005(e)(3)
- Nothing in these standards shall be interpreted to require a legal services provider to act contrary to the Rules of Professional Conduct for Attorneys, as codified in Wisconsin Statutes and Supreme Court Rules.

MINIMUM STANDARDS FOR FINANCIAL ASSISTANCE

1. Financial assistance includes the following: one-time payment for up to 6 months of rent in arrears including any late fees, short-term rental assistance up to 3 months, medium-term rental assistance up to 24 months, rental application fees, security deposits equal to no more than 2 months' rent, last month's rent, utility deposits, utility payments up to 24 months, and moving costs (or otherwise directed by the funder). Agencies may set maximum length of financial assistance based on program design and funding capacity, not to exceed 24 months.

2. Households can only receive assistance once in a three-year period or otherwise directed by the funder.
3. Households in CoC –funded Permanent Supportive Housing (PSH) can receive financial assistance if the program receives rental assistance funding, where the tenant has a lease directly with the landlord. If the PSH program is leasing or operation, the household is not eligible for financial prevention assistance.
4. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing for at least 30 days. Prevention funds may be provided for 6 months of rental arrears not to exceed two months of Fair Market Rent for the unit type.
 - a. All clients are assessed to determine initial need and create a budget to outline planned need for assistance, including establishing a plan for housing stability for the next 30 days.
 - b. The HSC expects that agencies will use progressive engagement and households receive the minimum amount of assistance necessary to stabilize in housing.
5. If providing short-term rental assistance (more than a one-time payment of rental arrears), eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
 - a. The program participant does not have an annual income that exceeds 30% of county median income.
 - b. The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
 - c. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
6. Financial assistance will be distributed in a way to ensure that programs have funds available throughout the grant period.
7. If providing ongoing rental assistance, projects will work with individual households to progress towards paying full rent. Rent includes the cost of rent and utilities as calculated using the utility allowance schedule. This may involve a scheduled tiering process where the household pays an increasing percentage of their income towards rent and the program pays less, a monthly household budget review to determine how much the household can pay or any other method that works for both the participant and the project. Financial assistance is available for households with zero income.
8. Projects must have written policies regarding the amount and duration of financial assistance which must be communicated to participants upon project entry.

MINIMUM STANDARDS FOR HOUSING RELOCATION AND STABILIZATION SERVICES

1. Housing Relocation and Stabilization Services include the following: housing search and placement, housing stability case management, mediation, legal services, and credit repair.
2. The total period for which program participants may receive the services must not exceed 24 months during any three-year period.

3. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
4. Eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
 - a. The program participant does not have an annual income that exceeds 30% of county median income.
 - b. The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
5. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
6. Homeless prevention participants receiving housing stability case management will be offered a meeting with a case manager not less than once per month to assist in ensuring long-term housing stability. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

2. YOUTH SPECIFIC SYSTEM NAVIGATION (SUPPORTIVE SERVICES ONLY)

System Navigation (SSO) staff support youth from initial contact with the homelessness system through location of permanent housing and connection to ongoing services. System Navigation staff will work intensively with individuals to learn about their service needs and life goals, assist in developing an individualized plan for meeting their goals, remove barriers to accessing services and meet the specific needs of individuals seeking support, including connection to housing. These services will be low-barrier in order to provide the greatest amount of access and work towards eliminating disparities in our community.

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless, 2- Imminent Risk of Homelessness, or 4- Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- Participants must be no older than 24 at the time of project entry. Once a participant is enrolled, there is no age limit and the participant will continue to be enrolled for up to the maximum allowed amount of time based on the project and participant's choice. For example, if someone enters the project at the age of 24, they can continue to receive services for up to the maximum allowed amount of time based on the project and participant's choice.
- *Serving Households Who Lack 3rd Party Documentation or Live in Unsafe Situations.* Youth aged 24 and under are not required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under the YHDP NOFO. Additionally, any youth-serving provider funded under the YHDP NOFO may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who are living in unsafe situations. HUD interprets "youth-serving provider" as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets "living in unsafe situations" as

having an unsafe primary nighttime residence and no safe alternative to that residence. This requirement supersedes any conflicting requirements under the YHDP NOFO, this appendix, the Act, or the CoC Program rule.

- Youth and young adult (YYA) referrals are generated through the CoC Coordinated Entry process to be piloted for youth-specific projects.

MINIMUM STANDARDS

1. Immediate Connection to System Navigation Staff: When a household is deemed eligible for supportive services, a system navigation staff member connects with the household to start housing planning for both immediate and permanent housing. Staff should connect with the household as quickly as possible, however specific guidance on the time frame can be found in the YYA-specific Coordinated Entry policy.
2. The maximum period of assistance for Supportive Services is 24 months, beginning once the participant is enrolled in the project.
3. System Navigation staff will walk alongside and support project participants from initial contact with the system to location of permanent housing and connection to ongoing services.
4. Peer Mentors and Navigators will work as a System Navigation team, and work intensively with project participants to learn about their service needs and life goals, prioritize immediate needs for housing stability and secure services.
5. Services will include: Peer Mentors that are paired with Navigators to work as a team, transportation, and intensive case management to help the project participant connect with housing, services, and community support.
6. System Navigation Staff may continue working with and providing support for up to six months after the project participant exits homelessness.
7. Trauma Informed Care: The six key principles of trauma informed care are safety; trustworthiness and transparency; peer support; collaboration and mutuality; empowerment, voice and choice; and responsiveness to the impact of cultural, historical, and gender discrimination and oppression. Staff will use a trauma-informed approach in all aspects of working with the clients, from initial connection, to creating plans, and partnering with the young person. Staff and organizational partners will be trained and retrained on a regular basis in trauma-informed practices. Locations where young people are accessing Navigation Services should be trauma-informed physical spaces.
8. Positive Youth Development: Focuses on identifying and developing young people's resiliencies and assets, rather than concentrating on their risks and deficits. It centralizes the role of guidance and support from caring adults and their roles in helping youth to grow up healthy, happy, and safe and to make positive contributions to their (chosen) families, schools, and

communities. Community systems and programs that embrace PYD are **strengths-based, forward-looking, protective, preventive, and empowering**. The project will partner with young people to identify their own goals, explore options, and walk alongside the young person to connect to services and housing. Staff and partners will be trained in Positive Youth Development practices.

9. Housing First: The key to the Housing First philosophy is that individuals and families are not required to first demonstrate that they are “ready” for housing. Housing First for young people involves providing young people with assistance to obtain safe, secure, and permanent housing that meets their needs as quickly as possible, without preconditions. A right to housing with no preconditions means that housing and support are separated, therefore access to housing cannot be defined by conditions such as participation in programming where non-compliance leads to a loss of, or a denial of, access to housing.

3. STREET OUTREACH

Street outreach is a strategy aimed at engaging individuals experiencing unsheltered homelessness who may not be accessing community resources. The primary goal is to connect them with emergency shelter, housing, and other critical services. The essence of street outreach lies in its mobile, non-facility-based approach, enabling outreach staff to reach out to individuals where they are, dismantling barriers to access.

ELIGIBILITY CRITERIA

The following are the federal ESG grant-specific requirements regarding participant eligibility. If the program receives funding from other sources, please refer to the grant contract for specific regulations. Complying with additional requirements or flexibilities specified by other funding sources will not be regarded as a violation of the CoC’s written standards.

- Participants must be experiencing unsheltered homelessness, meaning an individual or family’s primary nighttime residence is a public or private place not designed for or ordinarily used as a regular sleeping accommodation, including a car, park, abandoned building, bus or train station, airport, or camping ground (CFR 576.2 (1)(i)).

Exceptions to Eligibility Criteria:

- In some cases, determining participant eligibility for street outreach may not be immediately feasible during the initial encounter with new individuals. As part of the engagement process, street outreach staff can offer services until eligibility (i.e. unsheltered homelessness) can be verified. It is important to note that individuals who are determined not to be experiencing unsheltered homelessness during the initial engagement period are no longer eligible for street outreach services.

- Recognizing that participants' place of residence may change frequently and that the nature of effective street outreach is on creating meaningful relationship between the street outreach staff and the unsheltered participant, HUD specifies that street outreach case management can continue while participant is not unsheltered in the limited circumstances identified below:
 - o Program participant is already enrolled in the Street Outreach program; AND
 - o Program participant is not expected to remain in shelter, housing, or an institution for an extended period; AND
 - o It would be reasonably expected that the participant will end up sleeping outside or in a place not suitable for human habitation upon exit of the shelter, housing, or an institution.

MINIMUM STANDARDS

1. Client-Centered Approach: Street outreach services embrace individual needs and choices. This entails:
 - a. Conducting individualized needs assessments
 - b. Informing participants about emergency shelters, temporary housing, and permanent housing options
 - c. Ensuring answers for Coordinated Entry questions are answered in HMIS and updating as necessary
 - d. Completing the full Coordinated Entry assessment with identified participants
Facilitating connections to preferred permanent housing solutions
 - e. Addressing immediate physical requirements (meals, clothing, etc.)
 - f. Assisting participants in accessing eligible mainstream benefits and resources.
2. Mobile Outreach Focus: Outreach efforts prioritize mobility, reaching participants on their terms, rather than expecting them to visit facilities.
3. Engagement: The engagement process is vital in street outreach, especially when individuals are initially unwilling or uncertain about seeking assistance. Building trust and rapport through persistent follow-ups and check-ins is essential, while respecting individual autonomy and choice. Coordination with other outreach teams should be explored if a person refuses engagement.
4. Long-Term Engagement and Participant Exit: Generally, outreach staff will remain committed to supporting individuals until they obtain permanent housing. Participants will be exited from the street outreach program when they have:
 - a. Secured permanent housing; or
 - b. Enrolled in other supportive services, such as CCS, CSP, and shelter case management services, and expressed no further desire to receive street outreach services. (Street outreach staff can continue to work with participants enrolled in other case management services if they meet the street outreach eligibility and wish to continue to work with street outreach.); or

- c. Had no contact with outreach staff for a continuous period of 90 days, despite staff's efforts to connect.
- 5. Coordinated Entry Hub: Street outreach staff who use HMIS may become mobile hubs in the CoC's Coordinated Entry (CE) system. Initial certification and ongoing training is required to ensure competency in conducting CE assessments.
- 6. Collaboration and Service Coordination: To enhance effectiveness and avoid duplication, street outreach teams actively participate in CoC's outreach case conferencing meetings and ensure timely HMIS entries. Refer to the most up-to-date [HUD ESG Program HMIS Manual](#), specifically the Street Outreach section.
- 7. Documentation and Eligibility: Prior to referral to a PSH program that requires chronic homelessness verification, the following documentation must be completed and submitted to the Coordinated Entry Manager within 60 days of Tier 2 prioritization:
 - a. Documentation of disability
 - b. Homelessness documentation: evidence of the length and frequency of homelessness consistent with HUD's chronic homeless definition

For participants enrolled in multiple programs, the program designated to complete the Tier 2 assessment will take the lead on collecting documentation and providers will collaborate to ensure documentation is completed.

4. DIVERSION

Diversion² is a strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion specialists connect with people as they are requesting shelter or within 7-10 days of shelter entry. Diversion is not about keeping people out of the shelter system. It is about supporting self-resolution and should always be safe and appropriate according to the participant. Diversion services may include: short term case management; limited financial assistance; conflict mediation; connection to mainstream services/benefits; and housing search.

ELIGIBILITY CRITERIA

- A standard assessment tool is used to screen for diversion. See Appendix D for the Diversion Assessment Tool.

MINIMUM STANDARDS

1. Immediate Connection to Case Management: When a household is deemed eligible for diversion services, a case manager connects with the household to start housing planning for both immediate and permanent housing.

² Diversion section taken from: National Alliance to End Homelessness, "Closing the Front Door: Creating a Successful Diversion Program for Homeless Families"

2. **Resourceful Staff Members:** Staff should be familiar with the intake and assessment processes, have experience with landlord mediation and conflict resolution, and be knowledgeable about rental subsidies and financial literacy programs.
3. **Screening Tool and Process:** All households requesting shelter are screened for diversion eligibility using the Diversion Assessment Tool.
4. **Flexible Funding:** Funds should ensure households obtain housing, allow them to stay longer in a doubled up situation or unify them with family members.
5. **Participant safety** must be considered first. Participants decide what is safe and appropriate for themselves.
6. If a participant requests funds to relocate to another community, service providers must confirm they have housing in that community.
7. All participants who enter a diversion program must be entered into HMIS.

5. EMERGENCY SHELTER

Emergency shelter is any facility whose primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of people experiencing homelessness. Emergency shelters do not require occupants to sign leases or occupancy agreements.

ELIGIBILITY CRITERIA

Individuals and families defined as homeless under the following categories are eligible for assistance:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 3: Homeless Under Other Federal Statutes
- Category 4: Fleeing/Attempting to Flee Domestic Violence

MINIMUM STANDARDS

1. Shelter staff and volunteers will treat guests with respect and dignity. Shelter policies and procedures will promote a welcoming, safe and non-intimidating environment for shelter guests and staff. These policies and procedures must be explained to applicants prior to entering shelter. In addition, they must be posted in the shelter and on the agency's website.
2. Shelters must conduct an initial evaluation to determine the eligibility of each household for shelter and the essential services the household needs to regain stability in permanent housing, such as case management, life skills training, child care, mental health services, education services, transportation, employment assistance and job training, legal services, and health services. Essential service needs must be regularly reassessed.
3. Shelters must provide risk assessment and safety planning with shelter guests who identify as victims of domestic violence, dating violence, sexual assault, and stalking. Referrals will be made to domestic violence resources as needed.

4. Supportive services are available to assist persons in obtaining housing either on-site or through a daytime resource center. All shelter guests are notified of the availability of support services and how to access these services.
5. Shelters in the CoC will assess eligibility for mainstream resources and refer guests to applicable resources. Shelters will document referrals using the Dane CoC Mainstream Benefits Checklist and/or case notes. Documentation must be kept in the file for each household.
6. Shelter operates every day of the year. In the event of a temporary shelter closure for rehabilitation or major maintenance work, as much notice as possible should be provided to guests, and efforts should be made to find a short-term replacement facility.
7. Each shelter will have a policy of respect for each individual's self-identified gender. Guests who request shelter services will be admitted to the shelter operated for the gender to which an individual identifies. Transgender and gender non-conforming guests will be offered the same services and resources as all other guests. While shelter staff will take reasonable steps to accommodate specific needs, it may not be possible to segregate the guest from the rest of the shelter population. Staff will not share or in any way advertise the fact that certain guests may have identified themselves as transgender or gender non-conforming. Staff will not segregate guests in sleeping and restroom spaces unless requested by the guest.
8. All households with children, regardless of age, gender identification, sexual orientation, or marital status who identify as a household will be served as such in family shelter. Households will not be separated when entering family shelter. There can be no inquiry, documentation requirement or "proof" related to family status, gender identification and/ or sexual orientation. The age and/or gender of a child under the age of 18 or, if over 18, enrolled in high school cannot be used as a basis for denying any family's admission to a program that uses ESG funding or services if those programs serve families with children under age 18.³
9. There is no charge to a shelter guest for emergency shelter.
10. Documentation (including Photo ID, birth certificate, etc.) is not a barrier to shelter.
11. The CoC does not prescribe a maximum length of stay. Agencies may establish the maximum length of stay based on project design and resources available. Length of stay policies must be communicated to shelter guests at intake.
12. Guests may be asked to leave for a period of time in the event of serious infraction and only in the most severe cases such as for behavior that is deemed seriously threatening or harmful to other guests and staff. Suspending a shelter guest is allowed only when all other options have been explored and a suspension is necessary to protect the health and safety of staff and guests. All shelter guests will be notified of the agency's grievance policy. When it is not possible to serve a guest because of the guest's behavior, efforts will be made by shelter staff to assist the guest in finding alternatives. See Dane County Ordinance 30.04 for details on the procedure for discontinuing shelter services to a guest.
13. Shelters are required to give notice of changes regarding access to the Homeless Services Consortium via hsc@cityofmadison.com. The Homeless Services Consortium's website will be updated to reflect the changes.

³ From (24 CFR § 576.102 Prohibition against involuntary family separation) (24 CFR § 5.403 Definitions- Family) (24 CFR §570.3 Definitions - Household) (24 CFR 5.105(a) Nondiscrimination and equal opportunity)

ACCESS TO SHELTER

Information on how to access shelter can be found on the Homeless Services Consortium website (<https://www.danecountyhomeless.org/get-help>).

PRIORITIZATION FOR FAMILY SHELTER

Shelter is provided for households with children on a nightly basis. Priority is given to families with newborns (3 months and younger from May-October, 6 months and younger from November –April) and then to families who were denied the night before. As many families as possible are accommodated, based on space available. A factor that is accounted for is where the family sleeps when not accepted into EFS.

RECOMMENDED PROGRAM PRACTICES

Shelters will continue to work towards the following⁴:

1. Housing First Approach: Align shelter eligibility criteria, policies and practices with a Housing First approach so that anyone experiencing homelessness can access shelter without prerequisites, make services voluntary, and assist people to access permanent housing options as quickly as possible.
2. Safe & Appropriate Diversion: Provide diversion services to find safe and appropriate housing alternatives to entering shelter through problem-solving conversations, identifying community supports, and offering lighter touch solutions.
3. Immediate & Low-barrier Access: Ensure immediate and easy access to shelter by lowering barriers to entry and staying open 24/7. Eliminate sobriety and income requirements and other policies that make it difficult to enter shelter, stay in shelter, or access housing and income supports.
4. Housing-focused, Rapid Exit Services: Focus services in shelter on assisting people to access permanent housing options as quickly as possible.
5. Data to Measure Performance: Measure data on percentage of exits to housing, average length of stay in shelter, and returns to homelessness to evaluate the effectiveness of shelter and improve outcomes.

6. TRANSITIONAL HOUSING

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH. Programs will provide safe, affordable housing that meets participants' needs.

ELIGIBILITY CRITERIA

- Participants must meet categories 1 - Literally Homeless, 2 - At Imminent Risk, or 4 - Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- All TH program participants must fall into at least one of the categories below:
 - a. Individuals or head of household struggling with a substance use disorder

⁴ National Alliance to End Homelessness: The Five Keys to Effective Emergency Shelter infographic

- b. Individuals in early recovery from a substance use disorder who may desire more intensive support to achieve their recovery goals
- c. Survivors of domestic violence or other forms of severe trauma who may require and prefer the security and onsite services provided in a congregate setting to other available housing options
- d. Unaccompanied and pregnant or parenting youth (age 18-24) who are unable to live independently or who prefer a congregate setting with access to a broad array of wraparound services to other available housing options
- e. Individuals listed on a sex offender registry
- f. People re-entering the community after a stay in jail or prison

MINIMUM STANDARDS

1. Maximum length of stay cannot exceed 24 months.
2. Staff must assist participants with creating a housing stabilization plan which may include the following: creating a housing history, completion of subsidized housing applications, repair credit history, make payment plans on past debts, increase income, create positive housing history in current place, and advocate with landlords as needed. Additional supportive services are provided as needed.
3. Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

7. PERMANENT SUPPORTIVE HOUSING

Permanent supportive housing (PSH) is defined by the following criteria:

- Affordable – Housing is subsidized to ensure fiscal sustainability of household
- Safe – Housing meets standards of habitability
- Low-barrier – No required preconditions to access housing
- Supportive – Household has indefinite access to client-driven supportive services that follow household through housing transitions
- Community-focused – Housing is integrated, to its greatest extent, into the surrounding community and services support household in connecting to and interacting with community

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- PSH programs can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability
- PSH referrals are generated through the CoC Coordinated Entry process and the CoC-wide priority lists for families and individuals.

A. PRIORITIZATION FOR BEDS DEDICATED OR PRIORITIZED FOR PERSONS EXPERIENCING CHRONIC HOMELESSNESS

FIRST PRIORITY - Individuals and Families experiencing chronic homelessness with the Longest History of Homelessness and with the Most Severe Service Needs.

An individual or head of household experiencing chronic homelessness as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
- ii. The CoC or CoC program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs⁵.

SECOND PRIORITY - Individuals and Families experiencing chronic homelessness with the Longest History of Homelessness.

An individual or head of household experiencing chronic homelessness, as defined in 24 CFR 578.3, for which both of the following are true:

- i. The individual or head of household of a family experiencing chronic homelessness has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
- ii. The CoC or CoC program recipient has not identified the individual or the head of household experiencing chronic homelessness, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

THIRD PRIORITY - Individuals and Families experiencing chronic homelessness with the Most Severe Service Needs.

An individual or head of household experiencing chronic homelessness as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The individual or head of household of a family experiencing chronic homelessness has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and
- ii. The CoC or CoC program recipient has identified the individual or the head of household experiencing chronic homelessness, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

FOURTH PRIORITY - All Other Individuals and Families experiencing chronic homelessness.

An individual or head of household experiencing chronic homelessness as defined in 24 CFR 578.3 for whom both of the following are true:

⁵ See Section I.D.3. of the HUD Notice for definition of severe service needs.

- i. The individual or head of household of a family experiencing chronic homelessness has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least four separate occasions in the last three years, where the cumulative total length the four occasions is less than 12 months; and
- ii. The CoC or CoC program recipient has not identified the individual or the head of household experiencing chronic homelessness, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

B. PRIORITIZATION FOR BEDS NOT DEDICATED OR NOT PRIORITIZED FOR PEOPLE EXPERIENCING CHRONIC HOMELESSNESS

FIRST PRIORITY – Individuals and families experiencing homelessness with a Disability and Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

SECOND PRIORITY – Individuals and Families Experiencing Homelessness with a Disability with Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

THIRD PRIORITY – Individuals and Families Experiencing Homelessness with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

FOURTH PRIORITY – Individuals and Families Experiencing Homelessness with a Disability Coming from Transitional Housing

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing the transitional housing lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

RECORD KEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS⁶

1. Programs must have written intake procedures that establish the order of priority for obtaining evidence. The acceptable order of obtaining evidence as defined by HUD is:
 - i. third party documentation,
 - ii. intake worker observations, and
 - iii. certification from the person seeking assistance.

Records found in HMIS, including intake worker observations, are acceptable evidence of third-party documentation if there is a history of all entries including who entered the data, date of entry, and the change made AND if HMIS prevents overrides or changes of dates of entries made.

2. CoC-funded PSH programs whose grant agreement includes beds that are dedicated or prioritized for the chronic homeless must maintain records showing that those receiving assistance meet the definition of chronically homeless. Records must include evidence of homeless status, duration of homelessness and documentation of disability.

A. EVIDENCE OF HOMELESS STATUS

Evidence of a household's current living situation may be documented by written observation of an outreach worker, written referral by housing or service provider or self-certification from the person seeking service that they are homeless and living in a place not meant for human habitation, an emergency shelter or a safe haven. For paragraph 2 of the definition for persons residing in an institution, acceptable evidence includes:

- i. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrate the person resided there for less than 90 days. All oral statements must be recorded by the intake worker; or
- ii. Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the paragraph i. above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; and
- iii. Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter, and met the criteria in paragraph (1) of the definition for chronically homeless in 24 CFR 578.3, immediately prior to entry into the institutional care facility.

B. EVIDENCE OF THE DURATION OF THE HOMELESSNESS

⁶ CDP-14-012, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*, U.S. Department of Housing and Urban Development, July 28, 2014.

<http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf> AND CPD-16-11, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, U.S. Department of Housing and Urban Development, July 25, 2016.

<https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

Recipients documenting chronically homeless status must also maintain the evidence described in paragraph i. or in paragraph ii. below, and the evidence described in paragraph iii. below:

- i. Evidence that the homeless occasion was continuous, for at least one year.

Recipients must provide evidence that the homeless occasion was continuous, for a year period, without a break in living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter. A break is considered at least seven or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.

At least 9 months of the 1-year period must be documented by one of the following: (1) HMIS data, (2) a written referral, or (3) a written observation by an outreach worker. In only rare and the most extreme cases, HUD would allow a certification from the individual or head of household seeking assistance in place of third-party documentation for up to the entire period of homelessness. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and evidence of the efforts made to obtain third-party evidence as well as documentation of the severity of the situation in which the individual or head of household has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than 1 year and has not had any contact with anyone during that entire period.

Note: A single encounter with a homeless service provider on a single day within 1 month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing).

- ii. Evidence that the household experienced at least four separate homeless occasions over 3 years that combined total at least 12 months.

The recipient must provide evidence that the head of household experienced at least four, separate, occasions of homelessness in the past 3 years that combined total at least 12 months.

Generally, at least three occasions must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Any other occasion may be documented by a self-certification with no other supporting documentation.

In only rare and the most extreme cases, HUD will permit a certification from the individual or head of household seeking assistance in place of third-party documentation for the three occasions that must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and must document efforts made to obtain third-party evidence, and document of the severity of the situation in which the individual has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than one occasion of homelessness and has not had any contact with anyone during that period.

- iii. Evidence of diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. Evidence of this criterion must include one of the following: (1) Written verification of the condition from a professional licensed by the state to diagnose and treat the condition; (2) Written verification from the Social Security Administration; (3) Copies of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation); (4) Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed no later than 45 days of the application for assistance and accompanied with one of the types of evidence above; or (5) Other documentation approved by HUD
- iv. Evidence of Severe Service Needs: Evidence of score on VI-SPDAT, VI-F-SPDAT, or TAY-VI-SPDAT. This can be documentation found in HMIS. If a participant was brought into a program based on a medical exception, there must be case notes from the decision.
- v. Evidence that the recipient is following the CoC's Written Standards for Prioritizing Assistance: Order of prioritization must be incorporated into project's intake procedures and the project is following the procedures when accepting new program participants.
- vi. Evidence that there are no households meeting higher order of priority within the CoC's geographic area:
 - a. If a dedicated and prioritized PSH project fills a vacancy with a person not experiencing chronic homelessness, there must be documentation showing that there were no households in the CoC experiencing chronic homelessness. Documentation should include evidence of outreach efforts undertaken to locate eligible households experiencing chronic homelessness. If there are people experiencing chronic homelessness, but have not accepted assistance, documentation should specify the number of persons that meet this criteria and the attempts that have been made to engage the individual or families.
 - b. If a non-dedicated and non-prioritized PSH project serves a household who meets a lower order of priority, the project must document how the determination was made that there were no eligible households within the CoC's geographic area that met a higher priority.

MINIMUM STANDARDS

1. There can be no predetermined length of stay for a PSH project.
2. Supportive services designed to meet the needs of the project participants must be made available to the project participant throughout the duration of stay in the PSH project.
3. Project participants in PSH must enter into a lease agreement that is terminable for cause for an initial term of at least one year. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party.
4. Turnover beds in PSH projects will be prioritized for chronically homeless participants.

5. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies and the project is required to keep the unit for the participant's return.
6. PSH project will use Housing First approaches. (See Section I: General Requirements, Housing First)

8. RAPID RE-HOUSING

Rapid rehousing (RRH) is an intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid rehousing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are tailored to the unique needs of the household.

The core components of a rapid rehousing program are housing search and placement services, housing stabilization case management, short- and/or medium-term rental assistance and financial assistance. Program staff are expected to remain engaged with the households from first contact to program exit, using a progressive engagement approach and tailoring services to the needs of the household in order to assist the household to maintain permanent housing. According to the National Alliance to End Homelessness, progressive engagement is,

“a person-centered approach to ending someone’s homelessness. It is based on tailoring assistance to each individual or household’s needs and assessing what works best for them, with their specific strengths, and in their specific situation.”

PRIORITIZATION

RRH referrals are generated through the CoC Coordinated Entry process and the CoC-wide priority lists for families and individuals.

MINIMUM STANDARDS

1. RRH projects will use Housing First approaches, following the Minimum Standards listed in the Housing First section of the Written Standards.
2. Upon project entry, RRH projects will assess participants for their needs for supportive services, including housing search and placement, housing stability case management, mediation, legal services, and credit repair.
3. Program staff will assist participants in locating housing for a minimum of 90 days. The frequency and level of housing search and placement assistance will vary based on program participant need. Initial contacts with the participant will typically be at least weekly and continued contacts will be at least monthly. In-person contact is preferred whenever possible.
4. Supportive services designed to meet the needs of the project participants must be made available throughout the duration of participation in the RRH project. If services such as

mediation, legal services or credit repair is not provided by the project, staff will make appropriate referrals.

5. RRH programs will connect households with community resources and mainstream benefits to allow for individual resources to be used for housing costs.
6. Rental and financial assistance and services will be provided by using a progressive engagement approach. Assistance and services should be tailored to each individual household based on each household's needs. See Appendix G for additional resources on progressive engagement.
7. In order to help households quickly stabilize in housing, projects may pay up to 100% of move-in costs including security deposit, first month rent, and any required utility payments, unless the funding source has a minimum participant payment requirement. If a household moves into housing between the 1st and the 15th of the month, that month will be considered the "first month". If the household moves into housing between the 16th and the end of the month, the following month will be considered the "first month." In this situation, the program will provide 100% of the prorated rent in addition to the first month's rent.
8. Following the first month, projects will work with individual households to progress towards paying full housing expenses (rent and utilities). This may involve a scheduled tiering process where the household pays an increasing percentage of their income toward rent and the program pays less, a monthly household budget review to determine how much the household can pay or any other method that works for both the participant and the project.
9. Agencies must have policies related to the program's method of progressive engagement for financial assistance and services. Except for the maximum number of months the program participant receives assistance (24 months) and funding source specific requirements described in the chart below, the CoC does not prescribe maximum amount of assistance or maximum number of times that a program participant may receive assistance. However, agencies may set program specific limits in addition to those requirements.

Program policies and expectations must be communicated to project participants at program entry and must address the following:

Financial Assistance

- Maximum length of financial assistance
- Maximum amount of financial assistance, if any
- Type of financial assistance to be provided (e.g. security deposit, first month rent, monthly rental assistance, monthly utility assistance)
- (If security deposit was paid by the agency) what happens to security deposit at move out
- Proposed payment schedule, including participant and agency portions of rent, expected length of financial assistance
- Method used to adjust the payment schedule if needed

Services

- Required minimum frequency of case management meetings including housing search and placement and housing stabilization services, if any
- Maximum length of housing services including program extensions, if applicable

Different funding sources have varying participant eligibility criteria, eligible costs, and rental assistance requirements for Rapid Rehousing programs. A summarized overview of these variations can be found in the charts on the following pages. For more detailed information, please refer to the full regulations available for ESG/HPP, CoC, TBRA and HAP programs. (Note that State HAP funded programs must adhere to ESG/HPP requirements when utilizing HAP funds to match ESG funds.)

Participant Eligibility Criteria

	Initial Evaluation				Annual Re-Evaluation (On or before one-year mark)			
	ESG/HPP	CoC	HOME TBRA	State EHH-HAP	ESG/HPP	CoC	HOME TBRA	State EHH-HAP
Homeless Eligibility	Yes, see below for eligible categories	Yes, see below for eligible categories	Based on the Participating Jurisdiction (PJ) program design	Yes, see below for eligible categories	No**	No**	No**	No**
Category 1 Literally homeless -in emergency shelter and unsheltered, <i>not in TH</i>	✓	✓		✓				
Category 2 Imminent risk of homelessness	No	No, CoC funds allow but Dane CoC written standards do not		No, EHH funds allow but Dane CoC written standards do not				
Category 3 Homeless under other Federal statutes	No	No, CoC funds allow but CoC written standards and NOFOs do not		No, EHH funds allow but CoC written standards do not				
Category 4* Fleeing/attempting to flee domestic violence	✓*	✓*		✓*				

* Eligible only if also literally homeless

** Unless the household is still doing housing search at annual re-evaluation

	Initial Evaluation				Annual Re-Evaluation (On or before one-year mark)			
	ESG/HPP	CoC	HOME TBRA	State EHH- HAP	ESG/HPP	CoC	HOME TBRA	State EHH- HAP
Income Evaluation Required, based on County Median Income (CMI)	ESG- No, not at initial evaluation; only required at annual re-evaluation; HPP- Yes, at or below 80% CMI	No	Yes - Based on the PJ program design (can't be higher than 80% CMI and can be lower)	No	Yes – at or below 30% CMI	No	Yes - Based on the PJ program design (can't be higher than 80% CMI)	No, unless HAP funds are matched with ESG or HPP
Need (amount and type of assistance)	✓	✓			✓	✓		
Lacking Resources and Support Networks					✓	✓		

Eligible Costs

	ESG/HPP	CoC	HOME TBRA	State EHH-HAP
Maximum Length of Program Participation***	- Up to 24 months of program participation, may be shorter depending on the agency program design - Maximum number of months for rental assistance- not to exceed 24 months in a three-year period, including rental arrears	- Up to 24 months of rental assistance, may be shorter depending on the agency program design. - Supportive services may be provided until 6 months after the rental assistance stops.	Up to 24 months of program participation, may be shorter depending on the agency program design	Up to 24 months of program participation, may be shorter depending on the agency program design
Rental Assistance	- Short-term rental assistance (up to 3 months) - Medium-term rental assistance (4 to 24 months) - Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears)	- Short-term rental assistance (up to 3 months) - Medium-term rental assistance (4 to 24 months)	Rental assistance for up to 24 months *Rental assistance can be renewed depending on the funder program design and availability of funds *PJ must establish the payment standards, maximum amount of assistance	- Rental assistance up to 24 months (HAP does not have specific requirements, but Dane CoC Written Standards do) - Rent arrears *Participants must pay at least 25% of their gross income toward rent, including security deposit and first month's rent.
Rental Assistance Type	- Tenant-based rental assistance - Project-based rental assistance	Tenant-based rental assistance only	Tenant-based rental assistance only	- Tenant-based rental assistance - Project-based rental assistance

*** Except for the maximum number of months the program participant receives assistance described above, the CoC does not prescribe maximum amount of assistance or maximum number of times that a program participant may receive assistance. However, projects must set policies regarding a maximum amount of assistance or maximum number of times assistance is received.

	ESG/HPP	CoC	HOME TBRA	State EHH-HAP
Utilities	• Utility deposits and payments*(up to 24 months) • Utility arrears (up to 6 months) *Gas, electric, water/sewer are eligible; telephone, internet, and cable are not eligible *Utilities may only be provided if the participant has an account in their name with a utility company or proof of responsibility to make utility payments (cannot use utility allowance)	• Utility deposits and payments* *Gas, electric, water/sewer are eligible; telephone, internet, and cable are not eligible *Utility allowance is used	• Utility deposits and payments* *Gas, electric, water/sewer, trash are eligible; telephone, internet, and cable are not eligible *Only for participants who are receiving rental assistance are eligible to receive utility payments	• Utility deposits and payments • Utility arrears *Gas, electric, water/sewer are eligible; telephone, internet, and cable are not eligible
Other Eligible Financial Assistance	• Rental application fees • Security deposits (up to 2 months) • Last month's rent • Moving costs	• Rental application fees, only paid under supportive services • Security deposits (up to 2 months) • First and last month's rent • Property damage	• Security deposits (up to 2 months)	• Rental application fees • Security deposits • Utility deposits and payments (gas, electric, water, sewer) • Utility arrearages (gas, electric, water, sewer) • Moving costs
Supportive Services	• Housing search and placement • Housing stability case management	• Case management • Child care • Education services	• (TBRA funds cannot be used for supportive services. However, PJ may require providing	• Housing search and placement • Housing stability case management

	• Mediation • Legal services • Credit repair	• Employment assistance and job training • Food • Housing search and counseling services, including mediation, credit repair, and payment of rental application fee • Legal services • Life skills training • Mental health services • Moving costs • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation	supportive services with matching and leveraging funds.)	• Tenant/Landlord mediation • Legal services
Frequency of Supportive Services * *Also see the case management services section (page 6-7) for minimum standards for case management services.	Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability (§ 576.401(e)(i)).	Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month to assist the program participant in maintaining long-term housing stability (§ 578.37(a)(1)(ii)(F)).	No frequency requirement	No frequency requirement

Rental Assistance Requirements

	ESG /HPP	CoC	HOME TBRA	STATE EHH-HAP
Housing Standards	Units must meet HUD Habitability Standards, using the Habitability Standards Checklist	Units must meet HUD Housing Quality Standards (HQS), using HQS Inspection Form	Units must meet HUD Housing Quality Standards (HQS), using HQS Inspection Form	Units must meet HUD Habitability Standards, using the Habitability Standards Checklist
Fair Market Rent (FMR)	Rent must be at or below FMR	FMR is not required as long as rent reasonableness is documented	No specific FMR requirement, but PJ's rent standard may be tied to the FMR (e.g. 105% of FMR)	FMR is not required as long as rent reasonableness is documented
Rent Reasonableness	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form
Lead Safety	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.
Lease Standards	• Clients must have a legally binding lease. • "Master-leasing" is not allowed, meaning that agencies may not sign a lease and sublet the unit to a program participant. Leases must be between the owner and the client. • Leases must include VAWA addendum.	• Client must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause. • Leases must be automatically renewable upon expiration for terms	• Clients must have a legally binding lease. • "Master-leasing" is not allowed, meaning that agencies may not sign a lease and sublet the unit to a program participant. Leases must be between the owner and the client. • Leases must include VAWA addendum.	• Clients must have a legally binding lease. • Leases must include VAWA addendum. • Leases are <i>encouraged</i> to have an initial term of one year, but month-to-month lease is permitted. Leases may be renewed or extended as needed

	Leases are <i>encouraged</i> to have an initial term of one year, but month-to-month lease is permitted for a scattered site model tenant-based rental assistance. (Project based rental assistance must have an initial term of one year.)	that are a minimum of one month long, except on prior notice by either party. Leases must include VAWA addendum.	Leases must be for at least one year, unless the owner/manager and the tenant mutually agree to a shorter period. If the tenant has agreed to a different lease term, that agreement should be noted in writing in the tenant's file. A lease may not be for a period less than 30 days.	for as long as a client remains eligible.
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9. YOUTH-SPECIFIC JOINT TRANSITIONAL HOUSING – RAPID REHOUSING

Joint transitional - rapid rehousing projects provide a safe place for people to stay – crisis housing – with financial assistance and wrap-around supportive services determined by program participants to help them move to permanent housing as quickly as possible. Stays in the crisis housing portion of these projects should be brief and without preconditions, and participants should quickly move to permanent housing.

The project must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance or leasing and services provided through the TH-RRH component, to all program participants depending on each household's needs, for up to the maximum amount of time allowed under the funding source, as needed by the program participants. For example, a program participant may only need a temporary stay in a transitional housing unit, but the provider must be able to make available the financial assistance and supportive services that traditionally comes with rapid re-housing assistance to that program participant. After the participant exits the project, they may be provided up to 6 months of aftercare supportive services to help prevent returns to homelessness.

Youth-Specific Joint TH-RRH can consist of:

- Site-based TH paired with scattered-site RRH
 - When implementing this TH-RRH model, CoCs utilize a building in the community for the transitional housing portion of the project. When a youth or young adult in transitional housing has made clear that they are ready to move to permanent housing, project staff work with them to identify a unit in the community where they would like to be permanently housed and use the rapid rehousing portion of the project to assist the YYA.
- Scattered-site TH paired with scattered-site RRH (different unit)
 - When implementing this TH-RRH model, CoCs utilize scattered-site units in the community for the transitional housing portion of the project. A project may elect to use this model when it has a landlord partner in the community who is willing to rent their units for the TH portion, but the project wants to retain youth choice in the rapid rehousing portion and allow YYA to choose their unit within the community. When a youth or young adult has made clear that they are ready to transition to permanent housing using rapid rehousing assistance, project staff work with them to identify another unit in the community where they would like to be permanently housed.
- Scattered-site TH paired with scattered-site RRH (same unit)
 - When implementing this TH-RRH model, CoCs utilize scattered-site units in the community for the transitional housing portion. When a youth or young adult has made clear that they are ready to transition to permanent housing using rapid rehousing assistance, project staff work to transition the lease with the landlord to the youth or young adult.

For more information about Joint Transitional Housing - Rapid Rehousing please visit :
<https://files.hudexchange.info/resources/documents/YHDP-TH-RRH-Joint-Component-Project.pdf>

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless, 2- Imminent Risk of Homelessness, or 4- Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- Participants must be no older than 24 at the time of project entry. Once a participant is enrolled, there is no age limit and the participant will continue to be enrolled for up to the maximum allowed amount of time based on the project and participant's choice. For example, if someone enters the project at the age of 24, they can continue to receive services for up to the maximum allowed amount of time based on the project and participant's choice.
- *Serving Households Who Lack 3rd Party Documentation or Live in Unsafe Situations.* Youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under the YHDP NOFO. Additionally, any youth-serving provider funded under the YHDP NOFO may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who are living in unsafe situations. HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence. These requirements supersede any conflicting requirements under the YHDP NOFO, this appendix, the Act, or the CoC Program rule.
- YYA TH-RRH referrals are generated through the CoC Coordinated Entry process designed for youth-specific projects.

MINIMUM STANDARDS

1. Immediate Connection to Housing Advocate and Peer Support staff: When a household is deemed eligible for TH-RRH services, a TH-RRH staff member connects with the household to start housing planning for both immediate and permanent housing. Staff should connect with the household as quickly as possible, however specific guidance on the time frame can be found in the YYA specific Coordinated Entry policy.
2. YYA should not be required to have income or obtain a source of income as part of the project requirements.
3. There is no minimum length of stay in the TH portion, but the project must offer an occupancy agreement of at least 1 month.
4. The maximum period of assistance is dependent on the funding source, and as needed by the program participants.
5. YYA do not have to utilize both portions of the project, and can reside in only the TH or only the RRH.
6. Service teams will include a peer support specialist and Housing Advocate (case manager.) YYA will lead the development of a service plan in order to ensure the program is working for them. YYA will be connected with crisis and permanent housing, develop community connections, and have self-determination and access to support services that meet their identified needs.
7. The TH-RRH staff will remove barriers for people experiencing homelessness by identifying and supporting landlords through networking with friendly/interested landlords and providing

financial incentives (i.e. deposits, etc.) as well as connections to supportive services for problem solving. It is also essential that the program proactively engages in enforcing Fair Housing & Anti-Discrimination Rules by reporting violations and advocating with enforcement agencies. TH-RRH staff will partner with cross-system agencies for intersecting needs (disability, LGBTQ+, racism, etc.). This will require education and continued training for young people to be aware of their rights, options, and how to advocate for themselves when needed.

8. Financial assistance and case management should be flexible and based on a household's individual needs using progressive engagement.
 - Financial Assistance:
 - a. In order to help households quickly stabilize in housing, projects may pay up to 100% of move-in costs including security deposit, first and last month's rent and any required utility payments. Projects are encouraged to also pay for furniture and furnishings for the rental unit, moving costs, relocation costs, and any other allowable costs based on the funding source.
 - b. If the provider cannot find another suitable project that meets the needs of the participant within the CoC and the participant wants to move, the provider may relocate the participant to a unit that is located in a different CoC's geographic area and continue to provide assistance. In this case, providers should check on specific requirements based on the project's funding source.
 - c. Following the first month, projects will work with participants to create an individualized plan for rental contributions. Rent includes the cost of rent and utilities as calculated using the utility allowance schedule. This may involve a scheduled tiering process where the household pays an increasing percentage of their income towards rent and the program pays less, a monthly household budget review to determine how much the household can pay or any other method that works for both the participant and the project.
 - d. Projects must have written policies regarding the amount and duration of financial assistance which must be communicated to participants upon project entry.
9. The TH-RRH staff will attempt to connect with participants on a monthly basis. Case management should be flexible and available more often if requested and needed. Connection is considered to be making an attempt to meet with or communicate with participants in person, over the phone, virtually or by text or email. The preferred method of communication should be determined by the participant. Non-response is not grounds for removal from the project or termination of supports. In the event of non-response, the TH-RRH staff should document their attempt for engagement in participant's files.
10. Trauma Informed Care: The six key principles of trauma informed care are safety; trustworthiness and transparency; peer support; collaboration and mutuality; empowerment, voice and choice; and responsiveness to the impact of cultural, historical, and gender discrimination and oppression. Staff will be competent in safety planning and practices, project policies and procedures will be designed with trauma-informed practices in mind at every stage of the connection with the client from referral, to eligibility documentation, and housing and service planning.
11. Positive Youth Development: Focuses on identifying and developing young people's resiliencies and assets, rather than concentrating on their risks and deficits. It centralizes the role of guidance and support from caring adults and their roles in helping youth to grow up healthy, happy, and safe and to make positive contributions to their (chosen) families, schools, and communities. Community systems and programs that embrace PYD are **strengths-based**,

forward-looking, protective, preventive, and empowering. The project will partner with young people to identify their own goals, explore options, and walk alongside the young person to connect to services and housing. Staff and partners will be trained in Positive Youth Development practices.

12. Housing First : The key to the Housing First philosophy is that individuals and families are not required to first demonstrate that they are “ready” for housing. Housing First for young people involves providing young people with assistance to obtain safe, secure, and permanent housing that meets their needs as quickly as possible, without preconditions. A right to housing with no preconditions means that housing and support are separated, therefore access to housing cannot be defined by conditions such as participation in programming where non-compliance leads to a loss of, or a denial of, access to housing. Projects should have low-barriers to entry and accommodate people with possessions, partners, pets, or other needs. Incorporate client-choice by helping participants find permanent housing based on their unique strengths, needs, preferences, and financial resources. Participants will choose when they are ready to exit the crisis housing portion of the project and move to permanent housing, with providers assisting participants with this move.

10. COORDINATED ENTRY

Coordinated Entry is an important process through which people experiencing or at risk of experiencing homelessness can, have their strengths and needs assessed, and connect to appropriate, tailored housing and mainstream services within the community or designated region. Standardized assessment tools and practices used within local coordinated assessment processes take into account the unique needs of households. When possible, the assessment provides the ability for households to gain access to the best options to address their needs, incorporating participants’ choice, rather than being evaluated for a single program within the system. The most intensive interventions are prioritized for those with the highest needs.⁷

The Coordinated Entry (CE) policies and procedures are put in place by the Dane County Homeless Services Consortium to provide an effective Coordinated Entry System. The system is intended to match people in a housing crisis (either homeless or at-risk of homelessness) with the level of service needed to end the crisis and assist them in housing stability. All programs that receive Continuum of Care Program, Emergency Solutions Grant (ESG) or State of Wisconsin EHH Grant funding must abide by these policies and procedures. Programs funded through other sources may be required, and are highly encouraged to participate in CE and follow these policies and procedures.

Coordinated Entry responsibilities are completed at assessment hubs, which include both permanent and mobile locations. Coordinated Entry staff refers to staff paid through the CoC grant for Coordinated Entry.

ACCESS TO COORDINATED ENTRY

A. FULL COVERAGE

The Coordinated Entry System is accessible throughout Dane County. Households accessing emergency shelters, including domestic violence shelters, and those enrolled in street outreach programs will have

⁷ Opening Doors: Federal Strategic Plan to Prevent and End Homelessness, p. 57

access to Coordinated Entry. Assessment hubs are located at emergency shelters contracting with the CoC's CE lead .

Street outreach workers serve as mobile hubs, and will seek out people sleeping in places not meant for human habitation or other locations that serve vulnerable populations that are not assessment hubs. Street Outreach staff serving as Coordinated Entry mobile assessment hubs will complete the full Tier 2 assessment with clients who are invited to do so. The CoC will ensure the availability of at least one street outreach program that can serve the entire CoC geographic area.

If youth between the ages of 17.5 and 24 presents to overnight shelter or street outreach services, they should be referred to Youth System Navigation for additional support.

Households at-risk of experiencing homelessness, can access the Coordinated Entry Prevention Hub through the Tenant Resource Center.

The Homeless Services Consortium website has up-to-date information regarding access to Coordinated Entry: <https://www.danecountyhomeless.org/get-help>.

B. EMERGENCY SERVICES

All emergency shelters will participate in Coordinated Entry. This means that shelter staff will ask clients the intake questions including those used for Coordinated Entry Tier 1 and 2 assessments at program entry and enter the data into HMIS, updating the information as necessary. Shelter staff at Coordinated Entry assessment hubs will complete the full Tier 2 assessment with shelter guests who are invited to do so.

C. NONDISCRIMINATION

The CE system, programs that receive CoC, EHH, or ESG funds, and other participating housing and supportive services must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws, including the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, national origin/ancestry, religion, sex, age, family/familial status, disability/handicap, actual or perceived sexual orientation, lawful source of income, gender identity, marital status, domestic abuse/sexual assault/stalking victims, military discharge status, physical appearance, political beliefs, student status, domestic partnership, tenant union association, genetic identity, citizenship status, Section 8 housing voucher participant, non-religion, and homelessness.
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin under any program receiving Federal financial assistance.
- Title II of the Americans with Disabilities Act prohibits public entities, which includes State and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs and activities, which include housing, and housing-related services such as housing search and referral assistance.
- Title III of the Americans with Disabilities Act prohibits private entities that own, lease and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

If Coordinated Entry participants feel they have been treated unfairly by a specific agency or representative of that agency due to any of the above reasons, they may file a complaint with the agency through the agency's nondiscrimination complaint process. If after filing a complaint with an agency, the participant is not satisfied with the result, they may file a discrimination complaint with the City of Madison. Information on how to file a complaint can be found on the City of Madison's website at <http://www.cityofmadison.com/civil-rights>. Information and complaint forms are available at assessment hubs. Assessment hubs will post information on how/where to file a complaint.

D. ACCESSIBILITY

Assessment hubs may be accessed by all people who are currently in Dane County, and are experiencing homelessness or are at risk of homelessness. People experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence may present at any of the assessment hubs for which they qualify as a target population and be assessed for housing. Referrals will be made to agencies who specialize in serving specific populations.

A participant who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking will not be denied access to the Coordinated Entry process. CE staff will work with survivors to create safe and confidential access to the CE process based on individual needs.

Auxiliary aids and appropriate services must be provided to ensure effective communication with individuals with disabilities. This will include providing information in accessible formats such as Braille, audio, large type, assistive listening devices and using Wisconsin Relay. Whenever these services are provided, Coordinated Entry staff must document the accessible format provided.

Assessment hubs must be accessible to individuals who use wheelchairs.

Services are accessible to individuals with Limited English Proficiency (LEP). When an individual needs services in a language other than English, every effort will be made to find a qualified person who speaks the needed language. If a qualified person is not available, then a language line will be used to communicate with the individual. Individuals needing language assistance will be served as they present. They will not be asked to wait for services.

E. MARKETING

A marketing plan will be created to target those who may be least likely to access services. Data will be used to identify and target marketing materials toward potentially underserved groups. Outreach workers act as mobile assessment hubs and engage with those who traditionally do not access services. Marketing materials will indicate that physical assessment hubs are accessible to those with disabilities, that accommodations will be made if requested, and language services are provided. Marketing materials will be provided in English and Spanish. Posters will contain the words "Lus Hmoob" to indicate that Hmong speakers are available. In addition, marketing materials indicate that services are available to all people regardless of race, color, national origin/ancestry, religion, sex, age, family/familial status, disability/handicap, actual or perceived sexual orientation, lawful source of income, gender identity, marital status, domestic abuse/sexual assault/stalking victims, military discharge status, physical appearance, political beliefs, student status, domestic partnership, tenant union association, genetic identity, citizenship status, Section 8 housing voucher participant, non-religion, and homelessness.

The lead CE agency will develop and update marketing materials. Posters will be provided to area agencies and businesses that may serve people experiencing homelessness to display in prominent

areas. In addition, business cards will be provided to agencies and businesses to distribute to consumers. Marketing materials will be reviewed at least annually and updated if necessary. Updated materials will be distributed to agencies and businesses.

All information regarding CE will be available on the HSC website. Up-to-date materials and information will be available via the Homeless Services Consortium website.

Additionally, CE staff will present to agencies who want information on how the CE System operates. Initial presentations will be provided to agencies identified by the Core Committee. Future presentations will be provided as requested or if major changes are implemented in the operation of CE.

ASSESSMENT

A. ASSESSMENT PROCESS

The Dane CoC Coordinated Entry system utilizes a two-tier assessment and prioritization process.

When households present to CE, they will receive referrals to basic housing resources such as diversion services, housing location assistance, and/or case management. Households enrolled in street outreach programs or overnight shelters will answer Tier 1 Coordinated Entry assessment questions at program entry. These questions and information in HMIS regarding homeless history and service use will be used to prioritize households for RRH and PSH. The Tier 1 assessment evaluates these key factors and assigns priority points accordingly. Tier 1 assessment questions should be updated if there are major events that will affect someone's score.

The CE Manager will run the Tier 1 Rapid Rehousing and Tier 1 Permanent Supportive Housing reports on a regular basis. Households that score highly on the Tier 1 assessment will be invited to complete the Tier 2 assessment. The CE Manager will identify individuals to invite to complete the Tier 2 assessment based on the number of anticipated annual openings and the ratio specified in the Dane CoC Coordinated Entry Procedures (e.g., three times the number of annual expected openings). The CE Manager will connect with staff to complete the assessment with invited individuals. Staff conducting the Tier 2 assessment will ensure that individuals sign the Coordinated Entry Release of Information before completing the Tier 2 assessment. A household may be re-assessed with the Tier 2 assessment if there is a major life change. A major life change includes, but is not limited to the following: change in health status, and additional interactions with emergency services.

A household may decline to complete the Tier 2 assessment. If a household declines, staff must continue to work to engage with them. It is important to continue to learn and document their needs for appropriate housing/service provision.

The Coordinated Entry assessment process does not screen out people due to perceived barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance use, domestic violence history, resistance to receiving services, the type or extent of disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, mental health issues, medical need, perceived ability to live independently or criminal history.

B. COORDINATED ENTRY RELEASE OF INFORMATION

Agencies participating in Coordinated Entry (i.e. accepting referrals from Coordinated Entry to fill housing vacancies and operating overnight shelter or street outreach programs) are listed on the

Release of Information. Additional agencies may be added to the list if they assist in providing documentation of chronic homeless status or they can determine eligibility for mainstream housing benefits such as HUD-VASH or Section 8. If an agency would like to be added to the Release of Information, they should contact the Coordinated Entry Manager. The Coordinated Entry Manager will determine if it is appropriate to add the agency to the ROI based on their participation in Coordinated Entry and/or their involvement in providing chronic documentation on an ongoing basis. Agencies should **not** be added to the Coordinated Entry Release of Information for one-time needs. In these instances, a separate release of information form should be used.

Agencies may be removed if they no longer participate in Coordinated Entry, have not provided chronic documentation in the past 12 months, or violate the Homeless Services Consortium of Dane County Case Conferencing Agreement. The release is reviewed biannually by the HSC Core Committee (recommended in June and December).

C. SAFETY PLANNING

During the assessment, if a household indicates that they are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or community violence, CE staff will work with them to create a safe and confidential space to access Coordinated Entry. Community violence is defined as exposure to intentional acts of interpersonal violence committed in public or private areas by individuals who are not intimately related to the victim. CE staff will make a referral and provide immediate access to connect to a victim services provider. If a household ends up in shelter with a non-victim services provider, staff at the shelter will work on safety planning with the household including ensuring confidentiality and flexibility with regular procedures to ensure safety.

D. PARTICIPANT CHOICE

Members of the Dane County CoC understand that households know best their needs and wants. When a household is referred to a housing program, staff must let them know about their housing and service options. This should include location of the unit if in a single site location or assistance provided in locating a unit with a community landlord. Housing agency staff should provide a full menu of services the agency can provide and services they will refer out.

E. ASSESSOR TRAINING

The Coordinated Entry Manager is responsible for developing trainings about the Coordinated Entry System. Trainings may be offered live but can be recorded and posted on the Homeless Services Consortium website.

Required training for new Coordinated Entry staff includes:

- HMIS Licensure
- Madison / Dane CoC Coordinated Entry Workflow Training

Required training for participating agencies of the Coordinated Entry System includes:

- HMIS Licensure
- Madison / Dane CoC Coordinated Entry Workflow Training

Ongoing trainings will be developed based on the needs of the CoC. The CE Manager will seek input from the Core Committee and the CoC Board on needed trainings.

Training protocols will be updated and distributed annually. The Coordinated Entry Manager will review the protocols and receive feedback from the Core Committee.

ASSESSMENT TOOL AND PRIORITIZATION

Data collected during the assessment process is not used to discriminate or prioritize households for housing and services based on a protected class (see nondiscrimination section).

The following factors are assessed for RRH prioritization in the Tier 1 assessment:

- History of homelessness, including domestic violence shelter use – frequency and length of enrollment
- Income
- History of eviction
- Criminal legal system involvement
- Family size (family only)
- New to homeless but unable to self-resolve

In addition to the above factors, the following factors are also considered for PSH prioritization:

- Age
- Behavioral health crisis program utilization
- Medical crisis

The VI-SPDAT will continue to be used as the Tier 2 assessment until the Madison/Dane CoC determines an updated tool.

The Tier 2 prioritization for RRH is determined by the following components:

- Tier 2 assessment score (VI-SPDAT)
- New to homelessness points
- Length of shelter stay/number of bed nights

The Tier 2 prioritization for PSH is determined by the following components:

- Tier 2 assessment score (VI-SPDAT)
- Adjusted Tier 1 assessment score

When a household is eligible for Homeless Prevention Funds, they will be prioritized using the Prevention Scoring Tool (see Appendix C). The tool considers the following factors in prioritization:

- Eviction process
- Lives in subsidized housing
- Eviction history
- History of homelessness
- Criminal history
- Disability/Needs accessible unit
- Household of five or more members

Entrance to emergency shelter will not be prioritized in order to allow for an immediate crisis response. If a shelter has capacity issues, they will need to institute a prioritization policy.

Prioritization policies will be made publicly available via the CoC's website and notices placed at assessment hubs.

Please note that eligibility (see Assessment section) and prioritization are different. A household may be prioritized for an intervention, but they still must meet eligibility for that intervention.

REFERRAL

A. REFERRAL PROCESS

When there is an anticipated opening in a housing program, housing program staff will email the CE staff (cehousing@icalliances.org) to request a referral. A response is expected within 24 business hours.

The Coordinated Entry Manager will send a referral to Permanent Housing Programs (PSH and RRH) through HMIS after receiving email notification from the housing provider about the vacancy. This email serves as documentation of compliance with coordinated entry.

For PSH and RRH program openings, CE will provide one referral per opening. Once a participant is referred to a PSH or RRH program, they are removed from the CE list and cannot be referred to another program until the current referral is resolved.

Households shall not be steered toward any particular housing facility or neighborhood based on a protected class (see nondiscrimination section).

Housing providers may not reject a household for assistance based on perceived barriers to housing or services. CoC, EHH and ESG funded programs must use the Coordinated Entry process as the only referral source from which they fill vacancies in housing or services.

C. HOLDING A UNIT FOR CLIENT PLACEMENT

When an agency receives a name from the priority list, staff must initiate contact with the person within two business days. There may be circumstances where two agencies work together to connect with someone. It is the receiving agency's responsibility to ensure contact is made. Staff must adhere to the due diligence requirements outlined in the Dane CoC Coordinated Entry Procedures before proceeding to the next household referral. All attempts must be documented in HMIS under the Coordinated Entry Referral Follow Up section.

D. GRIEVANCE PROCEDURE FOR COORDINATED ENTRY

Households have the right to file a grievance if there is a violation of the Coordinated Entry Policies and Procedures received through the Dane County Coordinated Entry System. Households are informed about the grievance policy during their initial meeting with Coordinated Entry staff. The policy is accessible on the Homeless Services Consortium website (www.danecountyhomeless.org).

Households have the right to be assisted by an advocate of their choice (agency staff person, co-worker, friend, family member, etc.) at each step of the grievance process. Households have the right to withdraw their grievance at any time.

If a household has a grievance regarding a specific agency or representative of that agency, they should be directed to that agency's grievance policy. Agencies should post their grievance policies on their websites.

There are two levels of review available for each grievance.

- Level 1: The first person to review the grievance is the CoC Coordinator. Households should contact the CoC Coordinator for Dane County to start the process. Contacts can be made through the HSC website (www.danecountyhomeless.org) via the "contact us" function, hsc@cityofmadison.com or 608-266-6254. Grievances can be made in writing or verbally and should state the alleged violation of the Coordinated Entry policies and procedures. Within two business days, the CoC Coordinator will contact the agency/staff in question to request a response to the grievance, including any actions that were taken to attempt to resolve the issue. The response must be provided to the CoC Coordinator within five business days of request. Once the CoC Coordinator has gathered relevant information about the incident, they will decide what, if any, action needs to be taken. The CoC Coordinator will provide a written decision within 15 days of the initial complaint.

If both the household and the provider agree, the process ends and the resolution is implemented.

If the household or provider disagrees, the grievance moves to the next level.

- Level 2: The Dane County CoC Board of Directors President reviews the grievance within five business days of being informed of dissatisfaction with the Coordinator's resolution. The Board President may designate one or more Board members to review the situation. The grievant has the right to present any additional information and may present it in person. The Board will have 10 business days to gather and review relevant information. Within 30 days of the grievance being moved to Level 2, the Board President will provide a written decision. The decision of the Board of Directors is final.

DATA MANAGEMENT

The Coordinated Entry System uses a Homeless Management Information System (HMIS) to track data and store the community queue. The HMIS Lead Agency, the Institute for Community Alliances (ICA), has policies and procedures in place to ensure the adequate privacy protections of all household information. All HMIS users are required to abide by the [HMIS Policies and Procedures](#).

All HMIS users are required to complete an annual Security Training provided by ICA. The training covers the privacy rules associated with collection, management and reporting of client data.

Coordinated Entry staff will post the HMIS Consumer Notice in an area visible for program participants. The only information to be shared is that for which the household has been provided notice. Households will not be denied services for refusal to have their information shared in HMIS.

EVALUATION

The CoC must develop and update the Coordinated Entry evaluation plan. At minimum, the plan must include a review of the CE policies and procedures, assessment by households accessing the system and feedback from housing and service providers. The evaluation may look at the intake, assessment and referral process of Coordinated Entry. All participating agencies may be asked to evaluate the system. Surveys may be distributed to households at participating agencies including emergency shelters, street outreach programs, and participating housing programs. Any household information collected during

the evaluation period will be kept private. Surveys will be kept confidential and identifying information will not be collected.

The surveys for participants and housing and service providers will be developed by the Core Committee, and distributed according to a timeline set by the Core Committee. The Core Committee or other HSC designee will present the survey results and a plan to implement suggested changes to the CE System.

Based on the regular evaluation of the Coordinated Entry system, the CoC will consider adjustments for improvements. All evaluation findings and recommended changes will be presented to the HSC's Core Committee and Board of Directors for review and approval.

The Core Committee will receive updates from the CE Manager as requested. The CE Manager will seek feedback from the Core Committee as needed, in order to facilitate ongoing evaluation of the system.

APPENDIX A: DEFINITIONS OF HOMELESSNESS

1. 24 CFR §583.5 HUD HOMELESS DEFINITION

1. An individual or family who lacks a fixed, regular and adequate nighttime residence, meaning:
 - i. An individual or family with 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, camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangement (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
 - iii. An individual who 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:
 - i. The primary nighttime 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, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
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 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 (42 U.S.C. 14043e-2), 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);
 - ii. 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;
 - iii. 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
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
4. Any individual or family who:

- i. Is fleeing, or is 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 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 to their primary nighttime residence;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

2. 24 CFR §578.3 HUD CHRONICALLY HOMELESS DEFINITION

1. A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

3. 24 CFR §576.2 HUD AT RISK OF HOMELESSNESS DEFINITION

At risk of homelessness means:

1. An individual or family who:
 - i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - ii. 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 another place described in paragraph (1) of the "homeless" definition in this section; and
 - iii. Meets one of the following conditions:

- a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b. Is living in the home of another because of economic hardship;
 - c. 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;
 - 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;
 - 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); or
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e– 2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
 3. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

APPENDIX B: CERTIFICATION FOR EMERGENCY TRANSFER

CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

OMB APPROVAL NO. 2577-0286, EXP. 06/30/2017

PURPOSE OF FORM

The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

USE OF THIS OPTIONAL FORM

If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

1. A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
2. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
3. At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

SUBMISSION OF DOCUMENTATION

The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

CONFIDENTIALITY

All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that

disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL
ASSAULT, OR STALKING

1. Date the written request is received by victim: _____
2. Name of victim: _____
3. Your name (if different from victim's): _____
4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____
6. Name of the accused perpetrator (if known and can be safely disclosed): _____
7. Relationship of the accused perpetrator to the victim: _____
8. Date(s) and times(s) of incident(s) (if known): _____
10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____

Signed on (Date) _____

PUBLIC REPORTING BURDEN

The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

APPENDIX C: PREVENTION PRIORITIZATION TOOL

The information provided for the prioritization is based on self-report.

Factor	Score	Participant Score
Eviction Process (choose only one)		
Has a stipulated dismissal (court order) which requires payment of money	10	
Has an eviction court date scheduled	5	
Has a 5, 14, or 30 day notice but no court date scheduled	3	
Lives in Subsidized Housing (choose only one)		
Has Section 8 voucher or lives in CDA/DCHA public housing	5	
Lives in other subsidized housing (i.e. Northport, Meridian, etc.)	4	
Lives in Section 42 or comparable housing	2	
Eviction History (choose only one)		
Has 1 or more eviction judgement in CCAP in the past 2 years	5	
Has 1 or more eviction judgement in CCAP in the past 5 years	3	
Has ever had an eviction filed in CCAP	2	
Other eviction record or evictions that are not in CCAP	1	
Criminal History (choose one)		
On sex offender registry	5	
Past Felony(ies)	3	
Past misdemeanors	1	
Other Factors (may choose more than one)		
Needs and lives in wheelchair accessible unit	1	
Household of 5 or more members	1	
	Total	

APPENDIX D: DIVERSION ASSESSMENT TOOL

1. Where did you sleep last night?

2. If staying in someone else's housing:

(things to consider: rental/owned unit, landlord, total length of stay thus far, landlord's knowledge of situation)

a. What issues exist with you remaining in your current housing situation?

b. Can those issues be resolved with financial assistance, case management, etc.?

c. Are you currently experiencing domestic violence?

3. If coming from their own unit:

a. Is it possible and safe to stay in your current housing unit?

b. What resources would you need to do that? (give the examples below)

☐ financial assistance

☐ case management

☐ mediation

☐ transportation

☐ other: _____

5. What other safe housing options do you have for the next few days or weeks?

6. Is there anywhere safe you could stay for at least the next three (3) to seven (7) days if you were able to receive case management services/transportation assistance/limited financial support?

☐ Yes ☐ No

Help individual think through potential places – with family, friends, co-workers. Have them identify what barriers they think exist to staying in a certain location and how they might be overcome

APPENDIX E: TRANSFER REQUEST FORM

TO BE COMPLETED BY PROGRAM COORDINATOR OR PROPERTY MANAGER AND SUBMITTED TO CE MANAGER.

Note: This form will only remain active for 90 days. If household is still in need of transfer after 90 days, a new form must be submitted.

Date: _____ Name of Staff Requesting Transfer: _____

Head of Household Name: _____

Current Housing Program: _____ Program Entry Date: _____

Number of People in Household: _____ Number of Minor Children: _____

Transfers are limited to those that meet eligibility and prioritization standards listed in the *Program Transfer* section of the Dane County Written Standards. Please indicate which of the following standards the household meets:

- _____ Emergency transfer request (VAWA) [attach emergency transfer documentation]
- _____ ADA request for an accessible unit [attach documentation regarding accessibility needs]
- _____ Change in household composition*
- _____ Within 60 days of program termination**

*If transfer is due to a change in household composition, please describe the size of unit needed: _____

**If transfer is due to impending program termination, please list the following:

Lease Violation(s) that is causing termination:

Landlord/Property Manager Notices that directly relate to termination (types and dates):

Please indicate all attached documentation:

- _____ Verification of Disability [required for permanent supportive housing (PSH) transfers]
- _____ Homeless History [required for PSH]/Proof of Homelessness at Project Entry [required for rapid rehousing (RRH)]
- _____ Emergency Transfer Documentation [for VAWA requests]
- _____ Documentation re: Accessibility Needs
- _____ Other [please list]: _____

Staff Signature: _____ Date: _____

COORDINATED ENTRY MANAGER USE ONLY

_____ Transfer granted | Participant to transfer to the following program: _____

_____ Transfer denied | Notes: _____

APPENDIX F: LIST OF ACRONYMS AND GLOSSARY

Affordable Housing: Housing for which the occupant(s) is/are paying no more than 30 percent of their income for gross housing costs, including utilities. ([US Department of Housing and Urban Development](#))

AHAR = Annual Homeless Assessment Report: A HUD report to the U.S. Congress that provides nationwide estimates of homelessness, including information about the demographics of people experiencing homelessness, service use patterns and the capacity to house homeless persons. ([US Department of Housing and Urban Development](#))

Chronic Homelessness: A homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. ([US Department of Housing and Urban Development](#))

CoC = Continuum of Care: A HUD-mandated program designed to promote community wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. ([US Department of Housing and Urban Development](#)) The Homeless Services Consortium (HSC) is Dane County's CoC.

CE = Coordinated Entry: A process designed to quickly identify, assess, refer and connect people in crisis to housing and assistance, no matter where they show up to ask for help. It can pave the way for more efficient homeless assistance systems by: helping people move through the system faster to housing, reducing new entries into homelessness by consistently offering prevention and diversion resources upfront, and improving data collection and quality and providing accurate information on what kind of assistance consumers need. ([National Alliance to End Homelessness](#))

Dating Violence: Violence committed by a person:

1. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
2. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship. ([U.S. Department of Justice](#))

DV = Domestic Violence: includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by 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 jurisdiction. 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, they type of the relationship, and the frequency of interaction between the persons involved in the relationship. ([U.S. Department of Justice](#))

Diversion: A strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. ([National Alliance to End Homelessness](#))

Doubled-up: sharing the housing of other persons due to loss of housing, economic hardship or a similar reason ([Department of Education](#))

EHH = Emergency Solutions Grant, Housing Assistance Program, Homeless Prevention Program: These programs are collectively referred to as the EHH Program. ESG is Federally administered by the United States Department of Housing and Urban Development (HUD). HUD awards ESG funding to the State of Wisconsin Department of Administration Division of Energy, Housing and Community Resources (DEHCR) to distribute to eligible applicants. HAP and HPP are State of Wisconsin funding sources. ([State of Wisconsin, Dept. of Administration](#))

ES = Emergency Shelter, EFS = Emergency Family Shelter: A facility that plays a critical role in ending homelessness. It provides a safe, short term, nighttime residence for homeless persons, and help them find safe affordable housing outside the shelter. Emergency shelters do not require occupants to sign leases or occupancy agreements. Effective shelters embrace a Housing First approach, offer immediate and low-barrier access to anyone facing a housing crisis, and measure shelter performance in order to improve results. ([National Alliance to End Homelessness](#))

ESG = Emergency Solutions Grant: Federally administered by HUD. Funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance and HMIS; as well as administrative activities. ([US Department of Housing and Urban Development](#))

FEMA = Federal Emergency Management Agency: FEMA provides funds to the Emergency Food and Shelter Program to support social service agencies to supplement food, shelter, rent mortgage and utility assistance programs for people with non-disaster related emergencies.

Functional Zero: A community has ended veteran homelessness when the number of veterans experiencing homelessness falls below the average monthly housing placement rate. A community has ended chronic homelessness when the number of people experiencing chronic homelessness falls to 3 or fewer, or else .1% of the most recent point-in-time count (whichever is greater). ([Community Solutions](#))

GIW = Grant Inventory Worksheet: The GIW is used to record all grants that are eligible for renewal funding within a CoC's geographic area for the Continuum of Care (CoC) Program Competition. ([Dane County GIW for FY 2018 CoC Competition](#))

Harm Reduction: A set of practical strategies and ideas aimed at reducing negative consequences associated with drug use. Harm Reduction is also a movement for social justice built on a belief in, and respect for, the rights of people who use drugs. ([Harm Reduction Coalition](#))

HSC = Homeless Services Consortium: Dane County's Continuum of Care (CoC). The HSC is a partnership of agencies, funders, advocates and formerly homeless persons committed to preventing and ending homelessness.

HMIS = Homeless Management Information System: HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each Continuum of Care is responsible for selecting an HMIS software solution that complies with HUD's data collection, management and reporting standards. [Institute for Community Alliances](#) is the HMIS lead for the Dane County CoC. ([US Department of Housing and Urban Development](#))

Housing First: An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. ([Department of Housing and Urban Development](#))

Housing Locator: A person who identifies and recruits landlords and encourages them to rent to homeless households served by programs ([National Alliance to End Homelessness](#))

Housing Navigator: A person who works alongside households who are looking for housing. The navigator assists with development of a housing stability plan, assists in completion of housing search and applications, addresses barriers to housing placement, assists in appeal process for denials, helps in understanding of leases and helps to secure move-in costs.

HIC = Housing Inventory Count: The HIC is a point-in-time inventory of projects within the CoC that provide beds and units dedicated to serving persons who are homeless. It is intended to provide HUD and CoCs with information about the shelter and housing capacity of homeless crisis response systems. ([US Department of Housing and Urban Development](#))

Housing Stability: the extent to which a household's access to safe and permanent housing is secure.

HUD = [Department of Housing and Urban Development](#): HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination, and transform the way HUD does business.

ICA = [Institute for Community Alliances](#): HMIS Lead for Madison/Dane County CoC

LSA = Longitudinal Systems Analysis: An annual report, produced from HMIS and submitted to HUD, providing critical information about how people experiencing homelessness use the system of care.

McKinney-Vento Act: A federal law that ensures immediate enrollment and educational stability for children and youth experiencing homelessness ([Department of Education](#))

NOFA = Notice of Funding Availability: Each year HUD releases a NOFA that establishes the funding criteria for the Continuum of Care (CoC) Program. ([US Department of Housing and Urban Development](#))

PIT = Point-In-Time Count: A point-in-time count is an unduplicated count on a single night of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations ([National Alliance to End Homelessness](#))

PSH = Permanent Supportive Housing: Permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability to achieve housing stability. ([US Department of Housing and Urban Development](#))

Racial Justice: The systematic fair treatment of people of all races, resulting in equitable outcomes for all. ([Race Forward](#))

RRH = Rapid Rehousing: An informed by a Housing First approach that is a critical part of a community's effective homelessness crisis response system. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through housing location services, rental assistance, and access to support services. ([US Department of Housing and Urban Development](#))

Sexual Assault: any nonconsensual sexual contact proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent. ([U.S. Department of Justice](#))

SPDAT = Service Prioritization Decision Assistance Tool: An evidence-informed approach to assessing a household's acuity. The tool, across multiple components, prioritizes who to serve next and why, while concurrently identifying the areas in the household's life where support is most likely necessary in order to avoid housing instability. ([OrgCode Consulting Inc.](#))

Stalking: 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. ([U.S. Department of Justice](#))

SO = Street Outreach: Street outreach workers engage with people experiencing unsheltered homelessness in order to connect them with emergency shelter, housing or other critical services. Street outreach services are provided in non-facility-based settings for people experiencing unsheltered homelessness who are not accessing emergency shelter, housing or an appropriate health facility. ([Dane County Written Standards](#))

TAY = Transition Age Youth: Young people between the ages of 18-24.

TH = Transitional Housing: Housing designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing ([US Department of Housing and Urban Development](#))

Trauma Informed Care: An organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both consumers and providers, and helps survivors rebuild a sense of control and empowerment. ([The Trauma Informed Care Project](#))

Unaccompanied Youth: A youth not in the physical custody of a parent or guardian. ([United States Interagency Council on Homelessness](#))

VA = Veteran's Administration: The VA's mission is to provide veterans the world-class benefits and services they have earned – and to do so by adhering to the highest standards of compassion, commitment, excellence, professionalism, integrity, accountability, and stewardship.

VAWA = Violence Against Women Act: Creates and supports comprehensive, cost-effective responses to domestic violence, sexual assault, dating violence and stalking. Programs are administered by the U.S. Departments of Justice and Health and Human Services. ([National Network to End Domestic Violence](#))

VI-SPDAT = Vulnerability Index-Service Prioritization Decision Assistance Tool: A pre-screening tool that helps identify who should be recommend for types of housing and support interventions, moving the discussion from simply who is

eligible for a service intervention to who is eligible and in greatest need of that intervention. This tool helps prioritize people for interventions. ([OrgCode Consulting Inc.](#))

VI-F-SPDAT = VI-SPDAT for families

TAY-VI-SPDAT= VI-SPDAT for transition age youth

APPENDIX G: WEBSITES FOR ADDITIONAL INFORMATION

Case Management Resources

[Social Work Case Management](#)

[Wisconsin Balance of State CoC – Case Management Toolkit](#)

[HUD Exchange Case management Resources](#)

[Northwest Michigan Coalition to End Homelessness – Warm Transfer Process](#)

[Community Plan to Prevent and End Homelessness](#)

[Community Solutions – Built for Zero](#)

[Dane County Homeless Services Consortium](#)

[National Alliance to End Homelessness](#)

[National Center for Homeless Education](#)

[National Health Care for the Homeless Council: Engaging Youth Experiencing Homelessness](#)

[National Homelessness Law Center](#)

Progressive Engagement

[What is Progressive Engagement?](#) - National Alliance to End Homelessness

[Rapid Rehousing Handbook](#) - Point Source Youth

[Progressive Engagement](#) - Veterans Administration

[What is Progressive Engagement](#) - Safe Housing Partnerships

[Rapid Rehousing Toolkit](#) - National Alliance to End Homelessness

[State of Wisconsin – EHH Funding](#)

[U.S. Department of Housing and Urban Development, HUD Exchange](#)

[U.S. Department of Veterans Affairs](#)

[U.S. Interagency Council on Homelessness](#)

APPENDIX H: CASE MANAGEMENT GUIDE & TIPS

This appendix provides supplemental guidance for case managers. While not part of the written standards, these practices and reflections can help case managers build effective relationships with participants.

Support vs. Enabling

Support fosters long-term growth and responsibility. Enabling provides short-term relief but undermines stability. Understanding the difference between support and enabling is critical in case management relationships.

	Support	Enabling
Goal	Empowers participants toward stability and independence	Eases immediate distress but hinders long-term growth
Impact on Growth	Builds skills, confidence, and resilience	Protects from consequences, limiting learning
Responsibility	Encourages accountability and problem-solving	Excuses or assumes responsibilities that belong to the participant
Boundaries	Maintains clear, professional boundaries	Blurs professional lines, leading to dependency
Outcome	Increased independence, sustainable progress, improved quality of life	Dependency, worsening challenges, diminished responsibility

Serving vs. Helping

While both involve assisting others, serving emphasizes partnership and mutual respect. Serving fosters deeper relationships, holistic understanding, and shared responsibility. Case managers should aim to serve participants—building trust, recognizing strengths, and collaborating as equals.

	Serving	Helping
Approach	Focuses on “working <i>with</i> ” the participant, recognizing their expertise in their own life.	Implies “doing <i>for</i> ” for the participant, which can feel one-directional or transactional.

Centering Program Participants

Case management should empower participants to make their own choices. The case manager’s role is to provide information, options, and possible outcomes—not personal opinions.

- Seek to understand participants’ perspectives before offering guidance.

- Approach services as collaborative, non-judgmental, and adaptable to changing needs and desires.
- Respect participant autonomy, even when choices differ from professional recommendations.

Creative Problem—Solving

Effective case management often requires flexible, innovative approaches. Examples include:

- Partnering with community groups to expand resources (e.g., hygiene kits, skill-sharing).
- Using technology thoughtfully to maintain communication or share resources. Refer to the General Requirements: Use of Social Media section.
- Exploring nontraditional housing options (e.g., shared housing).

Creative solutions should always align with participant goals, maintain boundaries, and respect confidentiality.

When Contact is Lost

Consistent contact is critical to ensure participants receive support. When engagement becomes difficult, case managers should respond with persistence, empathy, and flexibility while respecting safety, privacy, and participant autonomy. Early in the relationship, case managers should explain the importance of staying engaged, outline follow-up expectations, and obtain emergency or alternative contacts.

Strategies for Re-Establishing Contact

- Check HMIS for other program enrollments or referrals.
- Visit or call overnight or day shelters.
- Coordinate with outreach teams, especially around known encampments or public spaces.
- Connect with meal sites or drop-in programs.
- Check health clinics, hospitals, or crisis centers.
- Determine if the participant is in custody or a correctional facility.
- Engage social networks (family, friends, employer) with participant permission.
- Contact community or faith-based organizations.
- Monitor social media/community forums cautiously, ensuring confidentiality.

All outreach efforts must be documented. If contact cannot be re-established, follow procedures for case closure and update the participant's file for potential re-engagement later.

APPENDIX I: LIST OF DOCUMENT REVISIONS

4/4/2016

Original version approved by the Madison/Dane County CoC Board of Directors.

8/26/2016

Revised the participant eligibility scoring criteria for permanent supportive housing and rapid re-housing programs to place a greater emphasis on a participant's VI-SPDAT score.

11/1/2016

Revised the participant eligibility criteria for rapid re-housing programs. Limited the eligible VI-SPDAT score range to the rapid re-housing score range suggested by the creators of the VI-SPDAT, OrgCode Consulting.

1/27/2017

Added prevention program standards.

5/19/2017

Board approved update to Street Outreach standards and approved Diversion standards and Diversion tool.

11/16/2017

Board approved addition of Emergency Transfer section.

01/19/2018

Board approved addition of Coordinated Entry Policies and Procedures appendix.

09/21/2018

Board approved revisions to Section 1.

10/19/2018

Board approved addition of Transfer Request Form appendix.

12/21/2018

Board approved update to Permanent Supportive Housing section.

03/15/2019

Board approved updates to Street Outreach, Diversion, Emergency Shelter and Transitional Housing sections.

05/17/2019

Board approved updates to Coordinated Entry section.

08/16/2019

Board approved updates to the prioritization policy.

11/22/2019

Board approved updates to the Rapid Rehousing section.

02/21/2020

Board approved updates to the Emergency Transfer Section. Removed language from PSH Minimum Standards around ensuring participant safety during extreme weather. Removed language from Termination and Grievance Procedures around holding participant property for 30 days.

10/16/2020

Board approved addition of prioritization requirements for prevention services.

12/18/2020

Board approved revisions to Introduction, Program Standards, Appendix G: List of Acronyms and Glossary, and Appendix H: Websites for Additional Information

9/23/2021

Board approved revisions to Prevention, Emergency Shelter, and Rapid Rehousing sections to meet State of Wisconsin funding requirements.

11/23/2021

Board approved removal of medical exception language.

04/15/2022

Board approved addition of program transfer section.

01/20/2023

Board approved change in the Coordinated Entry section to allow removal of names from priority list if they have not accessed services in the past six months (previously was in the last two years).

05/03/2023

Board approved addition of Youth Specific System Navigation and Joint Transitional Housing – Rapid Rehousing Sections.

07/05/2023

Board approved updates to Rapid Rehousing Section and addition of Progressive Engagement Resources to Appendix G.

01/03/2024

Board approved updates to the Street Outreach section.

04/03/2024

Board approved updates to standards pertaining to informing households about their educational rights and a new policy related to the Coordinated Entry Release of Information.

01/08/2025

Board approved updates related to Coordinated Entry based on the work of the Re-imagine Coordinated Entry Workgroup.

11/05/2025

Board approved addition of social media section and enhanced case management section and case management appendix.

City of Madison Recapture Policy

The Community Development Division will use recapture provisions for all assistance provided as direct subsidies allowable in homebuyer activities per 92.254. This provision will be the policy for all homebuyer assistance programs administered by the City of Madison and/or any direct subsidies provided by a subrecipient or developer.

Direct subsidies are defined as the mortgage reduction assistance and closing costs awarded to the homebuyer to purchase the property. Direct subsidies provided to homebuyers are given in the form of a 0% interest-bearing loan with shared appreciation due upon the sale, transfer of title, or the unit no longer remaining owner-occupied. CDD will recoup the amount invested in the property, plus shared appreciation. The calculation of the recapture amount is based on the net proceeds available from the sale, rather than the entire amount of the HOME investment. "Net proceeds" is defined as the sales price, minus superior loan repayment and any closing costs incurred by the borrower(s).

Recapture provisions permit homebuyers to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. CDD will record with the Register of Deeds a mortgage and a written agreement between the homebuyer and the City of Madison to enforce the recapture provisions and period of affordability requirements of 92.254 on each property. At the time of sale, CDD will be notified by either the homeowner or the title company, requesting a review of the recapture amount and removal of the lien on the property.

When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit and the net proceeds are not sufficient to recapture the full HOME investment, then the City of Madison will recapture the net proceeds (if any).