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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

2023 Action Plan

for the period **January 1, 2023** through **December 31, 2023**

Planned investments in community & neighborhood development projects and related efforts toward achieving the objectives described in Madison's 2020-2024 Consolidated Plan

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, 2023 through December 31, 2023. 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 U.S. Department of Energy (DOE) Energy Efficiency and Conservation Block Grant (EECBG) funds, HUD Continuum of Care (CoC) funds, HUD Youth Homelessness Demonstration Program (YHDP) funds, and HUD CARES Act 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 2023 Action Plan includes the six goals outlined below, targeting community needs related to affordable housing, economic development and employment, and strengthening neighborhoods.

<u>Goal 1 - Housing Development & Financing: Homeownership</u>

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

<u>Goal 2 - Housing Development & Financing: Rental</u>

- 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

This Action Plan allocates a total of approximately $22.4 million in anticipated 2023 Community Development Block Grant, HOME and ESG Entitlement funds, City funds, state HCRI and EHH funds, CDBG and HOME program income, and other funds—plus another $25.3 million in pre-2023 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 2022, the third year of the City's current 2020-2024 Consolidated Plan, the Community Development Division invested over $10.5 million in the community to meet the goals and objectives outlined in the City's 2022 Action Plan. CDBG, HOME and ESG funds were targeted primarily toward affordable housing, economic development and employment opportunities, and strong and healthy neighborhoods. In addition, $2.4 million in CARES Act funding was also expended on activities to help prevent, prepare for, or respond to the coronavirus.

Consolidated Annual Performance and Evaluation Reports (CAPERs) for previous program years are available on the City's website at www.cityofmadison.com/dpced/community-development/reports, for a more detailed summary of the City's evaluation of its past performance.

Summary of citizen participation process and consultation process

The City's Community Development Division, in coordination with its CDBG Committee, developed this 2023 Action Plan and its 2020-2024 Consolidated Plan with consultation from a diverse group of individuals and organizations. A public hearing on the City's 2023-2024 Community Development Goals and Objectives was held on April 20, 2023. An additional public hearing, specifically on a draft version of the City's 2023 Action Plan, was held on June 1, 2023. The Action Plan flows from the 2020-2024 Consolidated Plan, which was approved by HUD in September of 2020. Activities included in the 2023 Action Plan were approved at publicly noticed meetings of

the CDBG Committee and Common Council. Final approval of 2023 funds took place on November 15, 2022, as part of the City of Madison's 2023 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 2023 Action Plan period, the City conducted three focus group meetings between February 13, 2019 and March 1, 2019 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 stakeholders, sent to over 700 email recipients, forwarded through several community listservs, and made available on the City of Madison CDBG Office's website, accessible via Madison Public Library computers. Paper copies of the survey were distributed and mailed out upon request to individuals and at The Beacon homeless day shelter. A total of 511 individuals responded to the survey.

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. Paper copies were made available for review at all public libraries and City-funded neighborhood centers. A public hearing was held on September 5, 2019 to solicit public comment on needs, trends and potential obstacles for 2020-2024. An additional public hearing to solicit input on the Draft 2020-2024 Consolidated Plan was held on October 3, 2019. Finally, the Plan was provided to the Common Council on February 25, 2020, 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.

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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	Community Development Division
HOME Administrator	MADISON	Community Development Division
ESG Administrator	MADISON	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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AP-10 Consultation *24 CFR 91.100, 91.200(b), 91.215(l)*

This section includes consultation the City of Madison Community Development Division utilized 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(I)).

A public hearing on the draft 2023 Action Plan was held on June 1, 2023. In addition, numerous focus groups, general meetings and two public hearings were held as part of the larger planning process for the 2020-2024 Consolidated Plan. The 2023 Action Plan fits within the larger context of this overall five-year Plan.

The Community Development Division, in coordination with the CDBG Committee, developed the Action Plan to be consistent with its five-year Consolidated Plan, and in consultation with diverse groups and organizations. These included nonprofit partners, housing developers, other funders and other governmental bodies. Throughout the five-year planning process, a number of 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 opportunities, 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.

The City's Community Development Division regularly coordinates with and participates alongside local nonprofits, community service groups and funders. Community Development Division staff meet regularly with groups such as the Dane County Continuum of Care, neighborhood center directors, and Home Buyers Round Table. In addition, staff participates in various ad hoc City committees, such as Housing Strategy, Equal Opportunities, Urban Design, City-County Homeless Issues and Community Services Committees—all in an effort to improve service delivery and initiate systematic improvements for low-income and underserved populations. Community Development Division staff also work regularly on housing-related issues with staff of the City's Community Development Authority (CDA).

The Community Development Division, in coordination with the CDBG Committee, worked with a diverse array 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 as needed to discuss the City's housing and community development programs, and to coordinate regarding their implementation.

- CDD staff participates regularly in City/County Public Health Department brown bag forums that focus on community health improvement.

- The City's Information Technology (IT) Department leads the City's efforts on reducing the digital divide in low-income neighborhoods, along with the Madison Public Library. State of Wisconsin law prohibits municipalities from providing internet services; however, consultation with IT on expanding access is part of consultation for neighborhood plans.

- CDD staff consults with engineering services on emergency management plans for vulnerable populations.

- Through membership on the Equity Team, CDD staff participates regularly in the citywide Racial Equity and Social Justice Initiative.

- CDD staff members 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 coordinates regularly with Dane County and area nonprofits in relation to a significant construction employment initiative, 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, the CDD coordinates with City Planning staff and local nonprofits to encourage non-traditional housing types; coordinates with the CDA in development of a Comprehensive Housing Strategy; and resists neighborhood opposition to affordable housing. A summary of actions to address identified impediments to fair housing choice is included in **Appendix B**.

The CDD also regularly participates alongside, and coordinates with, other funders such as United Way, Dane County and various community nonprofits. Staff from the CDD meets 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.

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 the Planning Grant; 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 has implemented a number of recommendations from the *Community Plan to Prevent and End Homelessness in Dane County*. This plan was developed in collaboration with the City, County, United Way and HSC, and has served as a blueprint for ending homelessness in Madison and Dane County. In 2023, the City continues to participate in efforts to update the Plan, so that it can continue to serve as a guide for local stakeholders and funders. The City has contracted with HomeBase, as a consultant, to assist the community in creating a new Community Plan. Multiple engagement opportunities will be available to members of the CoC and the Community in general (presentations, focus groups, surveys, etc.). There is particular emphasis on engaging people with lived experience of homelessness to hear their feedback and receive input on strategies in the new Plan. The anticipated completion date is February 2024.

The City has long supported—and will continue to give preference to—projects that develop permanent supportive housing units that serve special needs populations. Development of the last two large-scale permanent supportive housing programs was led by the City and supported with the City's Affordable Housing Fund. Rethke Terrace opened in 2016 and now houses 54 formerly chronically homeless individuals. Tree Lane Apartments opened in 2018 and houses 40 formerly chronically homeless families. Both programs take residents directly from the CoC's Coordinated Entry housing priority list. The City also uses General Purpose Revenue to fund outreach efforts that connect chronically homeless individuals and families with housing and services provided by CoC agencies.

These services include:

- Long-term case management and other supportive services such as CCS
- Day and overnight shelter case management services
- Housing navigation services
- Restorative justice court program and other legal advocacy
- Eviction prevention financial assistance and services
- Mediation services
- Rapid re-housing
- Permanent supportive housing
- Sober living programs
- 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 immediate 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 administrating ESG and other homeless-related funds. HSC members are notified through an email distribution list of key CDBG Committee meetings where input is requested on City plans and performance.

Notifications regarding CDD funding processes are sent via e-mail distribution and also made available on the Division's website. Online access to the website is available via many options, including via public workstations at all Madison Public Library branch locations. The City reviews written applications from those who apply for ESG and other homeless-related funds. 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. Regularly, the CoC reviews information from HMIS to determine program effectiveness. The City currently contributes approximately 2.5% of its annual ESG allocation to 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 2023-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 to 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	City of Madison Community Development Division	*Five-Year Plan to End Homelessness in Dane County*: 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 City's CDBG and HOME allocations.
Fair Housing Equity Assessment	Capital Area Regional Planning Commission	Actions to address issues identified in the FHEA are incorporated into the Action Plan.
Analysis of Impediments to Fair Housing Choice	City of Madison	Actions to address impediments identified in the AI are incorporated in the Action Plan. (See **Appendix B**.)
City of Madison Housing Strategy	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.
Economic Development Strategy	City of Madison Economic Development Division	Economic development issues are addressed as part of the Plan's "Small Business Assistance" goal.
2014 Neighborhood Center Study	City of Madison Community Development Division	Neighborhood Centers are addressed as part of the Plan's "Neighborhood Asset Building" goal.
Race to Equity	Wisconsin Council on Children and Families	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.

Table 3 – Other local / regional / federal planning efforts

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 on the first Thursday of each month, 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 CDBG 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 three 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 2023 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 nine 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 a number of efforts to broaden its outreach and the participation of various community groups. In an effort 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 2023 programs and contracts on the Division's website on January 1, 2023. 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 2023 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 2023 Action Plan was posted on the Community Development Division's website on May 17, 2023, after HUD's 2023 allocation announcement, to ensure correct funding amounts were announced to the public. A notice was sent out via email listservs and also posted publicly to online City calendars on May 17, 2023, 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 were accepted through June 18, 2023. Common Council authorized final approval on June 20, 2023. The City of Madison received the following comments from the public regarding its 2023 Action Plan: (TBD).

The following specific outreach efforts and meetings were conducted regarding the 2023 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 1, 2023 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 CDBG Unit. (Submitted comments TBD.)
Internet Outreach	Non-targeted/broad community	Throughout the citizen participation period, the City's draft 2023 Action Plan was posted for public comment on the City's website, along with a copy of the adopted 2020-2024 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 12, 2023. Approval of the 2023 Action Plan was listed on the agenda for action. The Finance Committee voted to recommend approval of the City of Madison, Wisconsin 2023 Action Plan.
Public Meeting	Non-targeted/broad community	A publicly noticed meeting of the Madison Common Council was held on June 20, 2023. Approval of the 2023 Action Plan was listed on the agenda for action. The Common Council voted to approve the City of Madison, Wisconsin 2023 Action Plan and authorize its submittal to HUD.

Table 4 – Citizen Participation Outreach

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

AP-15 Expected Resources

24 CFR 91.220(c)(1,2)

The anticipated resources articulated in this Action Plan are based on assumptions about 2023 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 4				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	1,907,010	1,000,000	5,488,128	8,395,138	1,870,505	Estimated five-year average annual CDBG Entitlement allocation: $1,870,505
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership Tenant Based Rental Assistance (TBRA)	1,423,832	750,000	8,566,622	10,740,454	1,405,772	Estimated five-year average annual HOME PJ allocation: $1,405,772
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	166,993	0	75,133	242,126	163,194	Estimated five-year average annual HESG Entitlement allocation: $163,194

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
Future Madison	private	Services	22,622	0	0	22,622	22,848	Estimated five-year average annual Future Madison allocation: $20,773
EHH (ESG, HPP, HAP)	public - state	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Services Transitional housing Other	627,616	0	0	627,616	574,080	Estimated five-year average annual state EHH allocation: $574,080
HCRI	public - state	Homebuyer assistance	115,835	110,000	516,848	742,683	225,000	Estimated average award per 2-year HCRI grant period: $275,000
City of Madison	public - local	Housing Services	16,282,668	0	10,724,041	27,006,709	7,450,000	Estimated five-year average annual City allocation: $7,450,000

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 2023 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.

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AP-20 Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Objective Name	Start Year	End Year	Category	Goal Addressed	Funding	Outcome Indicator
1	**Housing Development & Financing: Homeownership**	2023	2023	Affordable Housing	Affordable Housing	CDBG: $2,896,573 HOME: $4,475,285 HCRI: $705,893 City: $1,317,900	135 units of homeowner housing rehabilitated *(includes 35 units of housing made accessible)* 8 units of homeowner housing added by acquisition & rehab of existing homes 40 homebuyers provided with direct financial assistance
2	**Housing Development & Financing: Rental**	2023	2023	Affordable Housing	Affordable Housing	CDBG: $2,184,169 HOME: $5,647,869 City of Madison: $18,858,141	80 units of rental housing constructed or rehabilitated
3	**Homeless Services & Housing Stability**	2023	2023	Affordable Housing Homeless Non-Homeless Special Needs	Affordable Housing	HOME: $400,000 ESG: $229,602 City of Madison: $2,230,998 EHH (ESG / HPP / HAP): $617,834	2,400 homeless persons assisted with overnight shelter 2,000 persons assisted through homelessness prevention services 4,000 persons assisted with other homeless services or housing resources 15 tenant households provided with TBRA
4	**Small Business Assistance**	2023	2023	Non-Housing Community Development	Economic Development and Employment Opportunities	CDBG: $1,375,612	50 jobs created 1,005 businesses assisted
5	**Neighborhood Asset Building**	2023	2023	Non-Housing Community Development	Strong and Healthy Neighborhoods	CDBG: $1,398,884 City of Madison: $3,924,028 Future Madison: $22,622	38,000 persons assisted through participation in neighborhood center activities 27,828 persons assisted through the creation or improvement of Public Facilities or Infrastructure 2,000 persons assisted through concentration neighborhood planning efforts and associated revitalization activities

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Sort Order	Objective Name	Start Year	End Year	Category	Goal Addressed	Funding	Outcome Indicator
6	**Program Administration**	2023	2023	Planning / Administration	Effective Planning and Program Administration	CDBG: $539,900 HOME: $217,300 ESG: $12,524 City of Madison: $675,642 EHH (ESG / HPP / HAP): $9,782 HCRI: $36,790	115 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 19 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.

AP-35 Projects *24 CFR 91.220(d)*

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 Strategic 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 Common Wealth Development, Movin' Out, and Wisconsin Partnership for Housing Development (WPHD).

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	Tenant-Based Rental Assistance (TBRA)
6	Homeless and Special Needs Populations
7	Housing Resources
8	Micro-Enterprise Development
9	Job Creation and Business Expansion
10	Neighborhood Focal Point Support
11	Capital Improvements for Community Organizations
12	Neighborhood Revitalization Plans and Projects
13	Overall Program Administration
14	ESG23 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 2020-2024 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**
	Objectives Supported	Housing Development & Financing: Homeownership
	Goals/Needs Addressed	Affordable Housing
	Funding	CDBG: $1,712,905 HOME: $398,845
	Description	Preserve and Improve the supply of affordable housing for homeowners
	Planned Activities	Owner-Occupied Rehab Loan Program PH Home Repair Program PH South Madison Home Repair Grants PH Home Rehab Loan Program Habitat Home Repair Program MACLT Housing Maintenance Fund
2	Project Name	**Owner-Occupied Housing Development**
	Objectives Supported	Housing Development & Financing: Homeownership
	Goals/Needs Addressed	Affordable Housing
	Funding	CDBG: $263,668 HOME: $1,401,608 City: $1,212,900
	Description	Expand the supply of affordable housing for homeowners
	Planned Activities	CWD Fremont Avenue New Construction Habitat Owl Creek Homeownership Development Kaba Ball Owl Creek Homeownership Development MACLT Northside Housing Acquisition & Rehab WPHD Mosaic Ridge Homeownership Development WPHD Scattered Site Acquisition & Rehab Housing Development Reserve Fund activities TBD
3	Project Name	**Homebuyer Assistance**
	Objectives Supported	Housing Development & Financing: Homeownership
	Goals/Needs Addressed	Affordable Housing
	Funding	CDBG: $920,000 HOME: $2,674,832 HCRI: $705,893 City of Madison: $105,000
	Description	Improve housing stability for homebuyers
	Planned Activities	Habitat Affordable Homeownership for Families Home-Buy The American Dream (HBAD) Program MO Homeownership Program
4	Project Name	**Rental Housing**
	Objectives Supported	Housing Development & Financing: Rental
	Goals/Needs Addressed	Affordable Housing
	Funding	CDBG: $2,184,169 HOME: $5,647,869 City of Madison: $18,858,141
	Description	Preserve, improve and expand the supply of affordable housing for renters
	Planned Activities	Small-Scale Rental Rehab Loan Program Capital Improvements for Non-Profit Housing (CINH) Grant Program Bayview Foundation Apts Rental Housing Renovation CDA/MRCDC Scattered Site Preservation Fourteen02 Park (aka Truman Olson) Rental Housing JTK University Park Rental Housing MCC Hancock Cooperative Rental Rehab MDC The Lillian Rental Housing Development MO Red Caboose Apts Rental Housing MSP The Heights Rental Housing Development MSP The Oscar Rental Housing Occupy Madison Solar Project Odessa Avenue Square Apts Rental Housing Development ReJenerate Rental Housing Cooperative Development SSD/MACHA Zapata Housing Cooperative Sustain Dane NOAH Energy Efficiency Upgrades Temp Family Shelter Boiler Replacement Temp Men's Shelter Roof Replacement Uno Terrace Rental Housing Development Affordable Housing Initiative activities TBD Housing Development Reserve Fund activities TBD
5	Project Name	**Tenant-Based Rental Assistance (TBRA)**
	Objectives Supported	Homeless Services & Housing Stability
	Goals/Needs Addressed	Affordable Housing
	Funding	HOME: $400,000
	Description	Rental assistance payments to eligible households
	Planned Activities	FAI Tenant-Based Rental Assistance (TBRA) Program

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6	Project Name	**Homeless and Special Needs Populations**	***[also see Project #14]***
	Objectives Supported	Homeless Services & Housing Stability	
	Goals/Needs Addressed	Affordable Housing	
	Funding	City of Madison: $1,653,778 EHH (ESG / HPP / HAP): $617,834	
	Description	Improve housing stability for renters, homeless and special needs populations	
	Planned Activities	CFC State Street Outreach & Mediation DCHS The Beacon Support HI Permanent Housing Supportive Services FSSF Emergency Hotel Rooms & Supportive Services ICA Dane CoC Coordinated Entry MACH OneHealth Housing-Focused Street Outreach Porchlight Permanent Housing Case Management	Porchlight Transportation Assistance Grant TRH Voucher Supportive Services TSA Diversion Case Manager TSA Emergency Shelter Operations & Case Management Sankofa Tree Lane Apartments Supportive Services Tellurian Rethke Terrace Supportive Services YWCA Family Shelter Rent subsidy, shelter and homelessness prevention activities TBD through 2023-24 state RFP process (EHH)
7	Project Name	**Housing Resources**	
	Objectives Supported	Homeless Services & Housing Stability	
	Goals/Needs Addressed	Affordable Housing	
	Funding	City of Madison: $577,220	
	Description	Provide information or other non-monetary resources to LMI persons, and support access to affordable housing opportunities	
	Planned Activities	EOTO Oak Creek HBE/Financial Wellness Program MO Southside HBE/Financial Wellness Program TRC Tenant Services	Permanent Supportive Housing Case Management / Capacity Building activities TBD ULGM Homebuyer Education / UEE Center
8	Project Name	**Micro-Enterprise Development**	
	Objectives Supported	Small Business Assistance	
	Goals/Needs Addressed	Economic Development and Employment Opportunities	
	Funding	CDBG: $499,723	
	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	
	Planned Activities	LCC Small Business Technical Assistance MBCC Smarter Black Businesses	WWBIC Business Development Loans Economic Development Reserve Fund activities TBD
9	Project Name	**Job Creation and Business Expansion**	
	Objectives Supported	Small Business Assistance	
	Goals/Needs Addressed	Economic Development and Employment Opportunities	
	Funding	CDBG: $875,889	
	Description	Create jobs, especially for under-represented individuals, by supporting new or expanding businesses	
	Planned Activities	MDC Business Loan Program	Economic Development Reserve Fund activities TBD

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10	Project Name	**Neighborhood Focal Point Support (NFPS)**
	Objectives Supported	Neighborhood Asset Building
	Goals/Needs Addressed	Strong and Healthy Neighborhoods
	Funding	CDBG: $366,000 City of Madison: $924,028 Future Madison: $22,622
	Description	Create, enhance or sustain the development and operation of physical assets, such as community and neighborhood centers, other physical amenities that help bring people of diverse backgrounds together or that help residents develop skills or take advantage of opportunities that will strengthen neighborhoods
	Planned Activities	NFPS: Bayview International Ctr for Education & the Arts NFPS: BGC Allied Family Center & BGC Taft Street Site NFPS: Bridge Lake Point Waunona Neighborhood Center NFPS: Badger Rock Neighborhood Center NFPS: East Madison Community Center NFPS: Goodman Community Center NFPS: Kennedy Heights Neighborhood Center NFPS: Lussier Community Education Center NFPS: MSCR Meadowood Neighborhood Center NFPS: Neighborhood House Community Center NFPS: Vera Court Neighborhood Center NFPS: Wil-Mar Neighborhood Center NFPS: WYC Elver Park Neighborhood Center NFPS: WYC Theresa Terrace Neighborhood Center
11	Project Name	**Capital Improvements for Community Organizations**
	Objectives Supported	Neighborhood Asset Building
	Goals/Needs Addressed	Strong and Healthy Neighborhoods
	Funding	CDBG: $743,384 City of Madison: $3,000,000
	Description	Create or improve safe, accessible, energy-efficient and well-maintained community and neighborhood facilities
	Planned Activities	BLPW New Center Development Bayview Neighborhood Investment Fund Community Facilities Loan (CFL) Program Acquisition/Rehab Reserve Fund activities TBD
12	Project Name	**Neighborhood Revitalization Plans and Projects**
	Objectives Supported	Neighborhood Asset Building Program Administration
	Goals/Needs Addressed	Strong and Healthy Neighborhoods Effective Planning and Program Administration
	Funding	CDBG: $289,500
	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
	Planned Activities	Concentration Neighborhood Planning EDD/OBR South Madison Building Improvement Grants Hawthorne-Truax Neighborhood Revitalization Projects TBD
13	Project Name	**Overall Program Administration**
	Objectives Supported	Program Administration
	Goals/Needs Addressed	Effective Planning and Program Administration
	Funding	CDBG: $539,900 HOME: $217,300 City of Madison: $675,642 EHH (ESG / HPP / HAP): $9,782 HCRI: $36,790
	Description	Provides staffing for City 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
	Planned Activities	Direct Administration and Support Services FHC Fair Housing Services EQT Older Adult Services Outreach & Engagement Futures Fund Reserve activities TBD
14	Project Name	**ESG23 Madison** ***[also see Project #5]***
	Objectives Supported	Individual, Family and Household Stabilization
	Goals/Needs Addressed	Affordable Housing
	Funding	ESG: $242,126 *(includes $22,693 from ESG21 and $52,550 from ESG22)*
	Description	Improve housing stability for homeless
	Planned Activities	ESG23 Homelessness Prevention, including: - CAC Prioritize Madison ESG23 Shelter, including: - TSA Emergency Family Shelter Operations & Case Management - YWCA Family Shelter ESG23 Street Outreach, including: - CFC State Street Outreach & Mediation ESG23 HMIS Services ESG23 Administration

Table 9 – Project Summary

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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 Department and CDD are currently working with the Hawthorne-Truax area to develop the next neighborhood plan.

Target Area	Percentage of Funds
(See this section's narrative.)	

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.)

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.)

AP-55 Affordable Housing *24 CFR 91.220(g)*

One-Year Goals for the Number of Households to be Supported	
Homeless	12
Non-Homeless	296
Special-Needs	0
Total	308

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	308

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

AP-60 Public Housing *24 CFR 91.220(h)*

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. Once 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 potential development of additional units under HUD guidance. 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 2023, 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 *24 CFR 91.220(i)*

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

Responses to these items are addressed in the Emergency Solutions Grant (ESG) portion of section AP-90 of this Plan (Program Specific Requirements), and in **Appendix E**, *One-Year Goals for Madison and Dane County CoC*.

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 2023, 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 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 recommends 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 conditional use on single-family 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.

Beginning in 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 Department of Planning and Community & Economic Development 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 2023.

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AP-85 Other Actions *24 CFR 91.220(k)*

Proposed actions associated with the City's 2023 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 2023.

Any other actions planned to:

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

  In 2023, 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 opportunities; 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.

  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 2023, 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 2023 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 centers and neighborhood plans in low- to moderate-income neighborhoods will be the City's highest priority in this area for 2023.

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

  Among the strategies the City of Madison will use in 2023 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.

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- Provide financing to demonstration projects to test the viability of alternative housing forms (Accessory Dwelling Units, Micro Housing, Cottage Housing).

- 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 Neighborhood Resource Teams, 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 2023, the City of Madison will 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.
- Continue to 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.
- Continue to implement revised internal Division outcome reporting structures to optimize efficiency and accuracy associated with annual performance reporting.
- Continue to 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 next five years, the CDBG Committee will continue 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.

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AP-90 Program Specific Requirements *24 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.	***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***	$ 828,754
2.	***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.***	$ 0
3.	***The amount of surplus funds from urban renewal settlements***	$ 0
4.	***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***	$ 0
5.	***The amount of income from float-funded activities***	$ 0
	Total Program Income:	$ 828,754

Other CDBG Requirements

1.	***The amount of urgent need activities***	$ 0
2.	***The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income***	100 %
3.	***Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.***	2023

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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 G**.

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.

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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 F1**, *City of Madison ESG Policies and Procedures Manual* and **Appendix F2**, *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, City staff member co-chairs the Reimagine CE workgroup, which aims to provide recommendations to the CoC Board of Directors on new assessment and prioritization systems. 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 have traditionally been combined with other federal (HOME, CDBG) and City funds as part of homeless service-focused funding processes. After reviewing proposals and receiving feedback from the public, funding decisions are generally made by 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 process was held to determine the use of 2022-2025 homeless service resources.

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

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 three alders and six 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 particular projects and oversees the development of all HUD projects funded throuogh 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, 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 other media platforms, as well as publications that target Persons of Color, special needs or target 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 before the start of the City's program year.

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 15 days for written public comment. The final AAP is approved by the City's CDBG Committee, Finance Committee and Common Council before it is submitted to HUD.

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 and identify 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. The draft is available to citizens at various locations, including public libraries, specified neighborhood centers, the CDD website and office, and other public gathering spots.

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 15 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. The CDBG Committee makes an effort to hold at least one meeting (either a regular monthly meeting or a public hearing) per year at a location where CDBG funds are directed or another low-income area.

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

OR

cdbg@cityofmadison.com

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
	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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
2	**Agency/Group/Organization**	**Boys & Girls Club of Dane County**
	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 the agency 2/19/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
3	**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
	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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

4	**Agency/Group/Organization**	**Madison Gas & Electric**
	Agency/Group/Organization Type	Civic Leaders Major Employer
	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 7/16/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
5	**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 focus groups to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
6	**Agency/Group/Organization**	**Wisconsin Partnership for Housing Development**
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing 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 2/13/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

7	**Agency/Group/Organization**	**Housing Initiatives, Inc.**
	Agency/Group/Organization Type	Housing Services - Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs - Chronically Homeless
	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 2/12/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
8	**Agency/Group/Organization**	**The Road Home Dane County, Inc.**
	Agency/Group/Organization Type	Housing Services - Homeless
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs - Chronically Homeless
	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 2/19/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
9	**Agency/Group/Organization**	**Madison Metropolitan School District**
	Agency/Group/Organization Type	Services - Children Services - Education Other Government - Local Major Employer
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied Youth Homelessness 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 3/1/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

10	**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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
11	**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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
12	**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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
13	**Agency/Group/Organization**	**Dane County Office of Economic and Workforce Development**
	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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

14	**Agency/Group/Organization**	**Forward Community Investments**
	Agency/Group/Organization Type	Civic Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy Economic Development
	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 02/02/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
15	**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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
16	**Agency/Group/Organization**	**Wisconsin Women's Business Initiative**
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy Economic Development
	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 03/01/19 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
17	**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/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

18	**Agency/Group/Organization**	**Home Buyers Round Table of Dane County**
	Agency/Group/Organization Type	Housing Business and Civic Leaders
	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 part of numerous focus groups to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

Table 2 – Agencies, groups, organizations who participated

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

As part of the Consolidated Plan process, 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 to 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	City of Madison Community Development Division	*Five-Year Plan to End Homelessness in Dane County*: 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 City's CDBG and HOME allocations.
Fair Housing Equity Assessment	Capital Area Regional Planning Commission	Actions to address issues identified in the FHEA are incorporated into the Action Plan.
Analysis of Impediments to Fair Housing Choice	City of Madison	Actions to address impediments identified in the AI are incorporated in the Action Plan. (See **Appendix B**.)
City of Madison Housing Strategy	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.
Economic Development Strategy	City of Madison Economic Development Division	Economic development issues are addressed as part of the Plan's "Small Business Assistance" goal.
2014 Neighborhood Center Study	City of Madison Community Development Division	Neighborhood Centers are addressed as part of the Plan's "Neighborhood Asset Building" goal.
Race to Equity	Wisconsin Council on Children and Families	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.

Table 3 – Other local / regional / federal planning efforts

Strategies & Actions to Alleviate Impediments to Fair Housing Choice

Given the nature of the Analysis of Impediments as a planning document used to formulate strategies & actions that overcome impediments to Fair Housing, the report, and therefore this summary, is research-based. In Fair Housing, research is a key component of realizing different impacts across different jurisdictions – an integral part of the process toward unique policy strategies tailored specifically to further opportunity within the City of Madison

Within the City of Madison, the report was analyzed by a team within the Community Development Division, and taken to and refined by a staff team consisting of 11 individuals from Divisions across the Department of Planning, Community, and Economic Development. One of the main elements for consideration in refining actions was to create actions that are both implementable and impactful, respecting the differences and unique aspects of different neighborhoods of the City of Madison.

Actions to Alleviate Impediments to Fair Housing Choice – Taken from 2018/19 Madison AI

Due to the nature of Impediments to Fair Housing Choice, goals and actions to alleviate impediments often encompass several "impediment areas," each action impacting groups and individuals by social position, identity, history, etc. For this reason, goals and actions are listed by implementation type, along with different impediment areas they address. Please see the 2018/19 Analysis of Impediments to Fair Housing Choice for a list of identified impediments. Items shaded green in the table below are deemed to be the highest priority because of their potential to have a high impact in the City's housing market, and the strategies have been determined to be highly feasible to implement.

Goals and Actions	Impediment Area	Division
1. Development and Plan Actions		
1. Reduce potential impact of neighborhood opposition to affordable ownership and rental housing development a. Create a communication and educational plan for affordable housing for presentations to neighborhood(s).	Race & Ethnicity, Income, Housing Stock, Public	Planning, Civil Rights
2. Continue to proactively address redevelopment pressures though inter-Division communication and cooperation, prioritizing City funding and program activities to areas identified as facing challenges to equitable development	Race & Ethnicity, Income, Public	Planning, Zoning, CDA, Community Development, Civil Rights
3. Review current regulations within the zoning code and adjust as necessary to maximize potential for context-sensitive density increases in residential and mixed-use districts, supporting missing middle housing types (townhomes, small lots, etc.)	Race & Ethnicity, Age, Disability, Income, Housing Stock, Public	Planning, Zoning
4. Review and adjust ADU zoning ordinance to allow interior-ADU (basement/attic/etc.) conversion by-right in all residential districts a. Explore opportunities to shift from conditional to permitted use for detached ADU types in residential districts	Race & Ethnicity, Age, Disability, Income, Housing Stock, Public	Planning, Zoning
5. Explore removal or modification to City ordinance requiring conditional use for 2 or more unit structures being within a set proximity in residential districts	Housing Stock, Public	Planning, Zoning, Common Council
6. Planning documents should include or be amended to include acknowledgement of residential racial and economic segregation as an impediment to fair housing a. Consolidated Plan b. Biennial Housing Report c. Comprehensive Plan d. Sub-Area/Neighborhood Plans	Race & Ethnicity, Income, Housing Stock, Public	Planning, Community Development, CDA, Zoning

Goals and Actions	Impediment Area	Division
7. Explore adjustments to current zoning to be consistent with the Future Land Use Map and Comprehensive Plan, preemptively easing barriers to development of more affordable housing types in areas where diversification of housing stock would be beneficial a. Ex: Adjusted Generalized Future Land Use Low-Medium Residential district allows missing middle and other higher-density structures, but zoning still may serve as impediment to affordable development (adjustments should be explored across all districts to maximize efficiency in development) b. Ex: Proactively adjust zoning after completion of detailed public engagement projects such as sub-area plans, etc., and review neighborhood plans as written to determine opportunities for upzoning consistent with the plan c. Ex: Promoting Future Land Use density increases to developers to better take advantage of the intensive public engagement that increased density allowances in certain areas of the City through the Comprehensive Plan	Race & Ethnicity, Income, Housing Stock, Public	Zoning, Planning
8. Preemptively explore opportunities to redefine "low cost housing" within City ordinance to promote affordability of smaller unit types that could be exempted from future impact fees due to affordability a. Ex: Accessory Dwelling Units and other unit types create opportunities for "low-cost" housing not reflected in current policy	Income, Housing Stock, Age, Public	Community Development, Planning
9. Future neighborhood planning documents should include specific, neighborhood-level steps to overcome historic and current patterns of potential market exclusion a. Ex: Neighborhood plans should propose steps to address neighborhood-specific barriers to fair housing, such as diversity of housing stock, ownership types, and affordability levels, providing specific actions to increase access to residential areas b. Ex: Special Area Plans should address barriers to affordable housing, propose strategies to incorporate affordable housing, and identify and address challenges to equitable development, creating plans for increased fair housing opportunity	Race & Ethnicity, Income, Housing Stock, Public	Planning, Zoning, Civil Rights
10. Explore relaxing administrative barriers to development, promoting increased development at all rental and ownership levels	Income, Housing Stock, Public	Planning, Zoning
11. Explore implementation of "fair share" zoning and density planning, allowing neighborhoods or aldermanic districts public engagement processes to select parcels for upzoning and promotion for higher-density development a. Ex: Metropolitan Council of the Twin Cities utilizes an "affordable housing scorecard", which prioritizes funding and grants for communities that meet affordable housing production quota	Income, Housing Stock, Public	Planning, Zoning, Common Council
12. Explore opportunities to relax the City's review of demolition proposals for residential development	Income, Housing Stock, Public	Planning, Zoning, Building Inspection
13. Review and adjust City zoning ordinances to allow cohousing, housing cooperatives, or other group living arrangements as permitted uses in residential and mixed-use districts	Income, Housing Stock, Public	Planning, Zoning

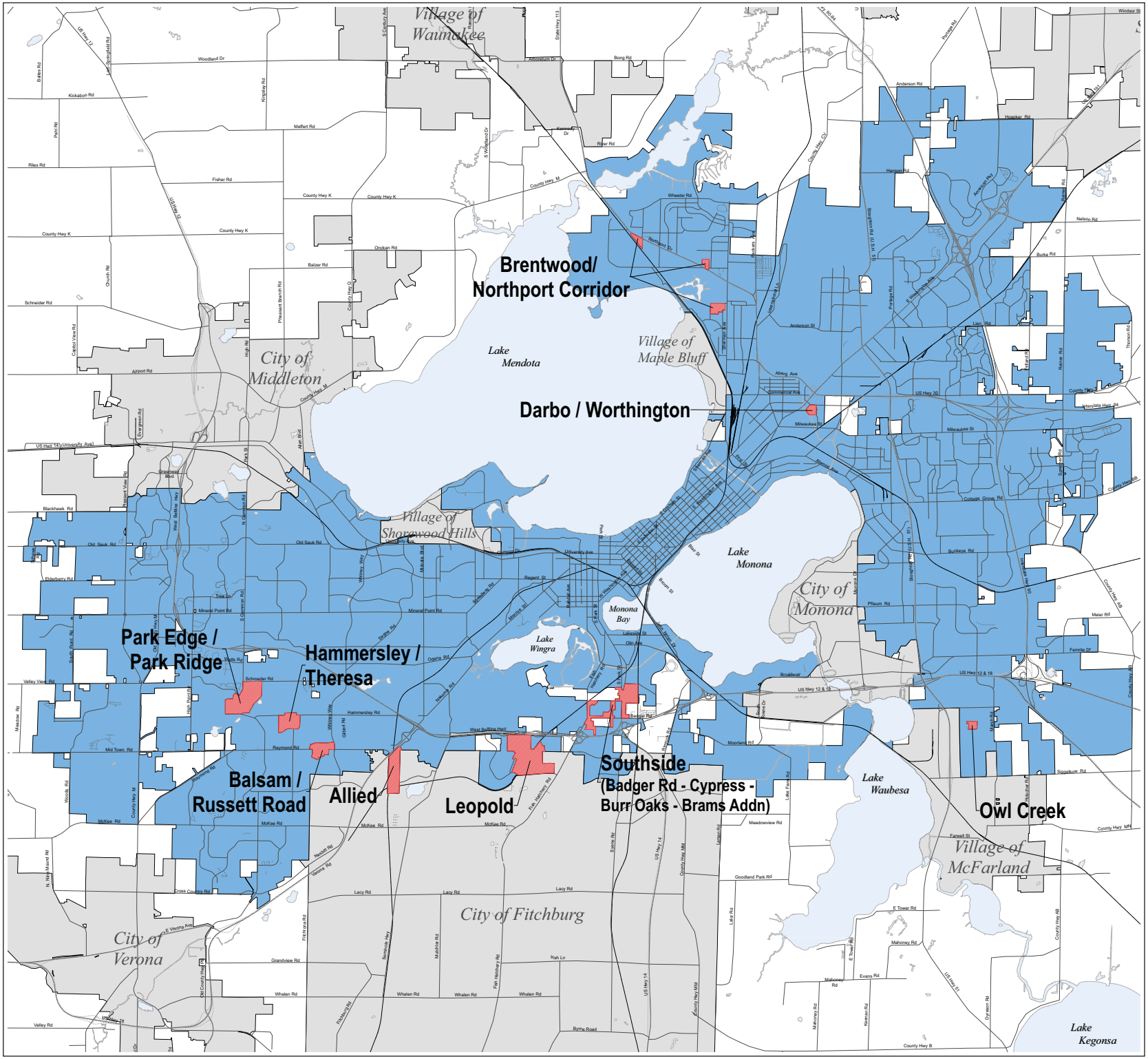
Goals and Actions	Impediment Area	Division
2. Program Actions		
1. Continue supporting affordable development through capital budget commitments to the Affordable Housing Fund a. Build non-profit capacity to participate in the development of new affordable housing b. Enhance program requirements guaranteeing long-term affordability	Race & Ethnicity, Disability, Income, Housing Stock, Public	Common Council, Community Development, Planning
2. Develop programs to encourage/target affordable housing in areas of the City that specifically lack large numbers of affordable units and rental units* a. Programs should include both increasing access to interior neighborhoods through missing middle development (townhomes, small lots, etc.), as well as LIHTC & other larger scale development	Race & Ethnicity, Income, Housing Stock, Public	Community Development, Zoning, Planning, CDA
3. Explore opportunities for expansion of tenant protections and support a. Expand landlord education programs b. Expand tenant/landlord mediation programs c. Expand investment into eviction-prevention programs d. Partner with MG&E to distribute information to new tenants when opening utility accounts	Race & Ethnicity, Disability, Income, Public, Legislative, Homelessness	Community Development, Civil Rights
4. Consider regular RESJI Analyses of current and future Metro routes and scheduling, including complete current system analysis and proposed BRT, to evaluate effectiveness of service in meeting demands of transit-dependent riders, low-income communities, and Communities of Color	Race & Ethnicity, Disability, Age, Income, Public	Metro, Planning, Civil Rights
5. Increase mortgage and loan accessibility to households with adverse credit history a. Fund targeted credit-repair programs for borrowers b. Continue to support alternative credit-scoring models in underwriting for City programs c. Continue outreach to lenders to inform of fair housing obligations and importance of alternative credit scoring d. Continue to fund homeownership education opportunities	Race & Ethnicity, Income, Lending, Public	Community Development, Civil Rights
6. Continue and expand targeted funding of educational support programming provided by non-profits for youth in areas that show highest disparities in educational outcomes a. Focus programs more explicitly on increasing high school graduation rates and attainment of higher education to increase lifetime income potential	Race & Ethnicity, Disability, Income, Education	Community Development
7. Explore changes to better target downpayment assistance program as a tool to further fair housing a. Expand affirmative marketing of downpayment assistance programs to underrepresented groups, increasing access to high-ownership areas b. Explore increased levels of downpayment assistance offered in areas that are already moderate- to high-income with appreciating value c. Incentivize downpayment assistance in areas undergoing or planned to undergo challenges to equitable development identified through planning processes	Race & Ethnicity, Income, Housing Stock, Lending, Public	Community Development, Planning
8. Continue exploring use of alternative/expanded data points in mapping process for housing investments, refining preference areas based on unique City attributes (high relative income, active living, lack of rental housing, areas cost prohibitive to development, etc.) a. Explore including siting/access to higher-performing public schools as a preference in applications for City housing assistance	Race & Ethnicity, Age, Disability, Income, Housing Stock, Public	Community Development, Planning
9. Explore developing loan products targeted to senior owner households for home modifications that allow residents to age in-place	Age, Disability, Income	Community Development
10. Continue Property Tax Assistance for Seniors program, and explore opportunities for potential to expand program to serve homeowners with limited equity	Age, Disability, Income	Community Development

Goals and Actions	Impediment Area	Division
11. Further develop and refine affirmative marketing and tenant selection best practices as requirement for participation in City programs	Race & Ethnicity, Disability, Income, Housing Stock, Public	Community Development, Civil Rights, CDA
12. Remove barriers to filing of housing discrimination complaints on City websites a. Reorganize the City's search page to direct to DCR as top result for "housing complaint" b. Add "Housing Discrimination" to the City's Report a Problem webpage (Currently Civil Rights Discrimination and Employment) c. Add a Discrimination Complaint link from Building Inspection's Complaints webpage	Race & Ethnicity, Disability, Age, Income, Public	Civil Rights, Building Inspection
13. Review TIF policy as tool to promote and expand affordable housing without LIHTC requirement	Race & Ethnicity, Income, Housing Stock, Lending, Public	Community Development, Economic Development, Planning
14. Review ordinances that disproportionately criminalize homeless individuals a. Continue to support programs that remove barriers to housing caused by interactions with the judicial system	Race & Ethnicity, Income, Public	Common Council, Community Development
15. Partner with community development organizations or other partners to review lending patterns of financial institutions in the City a. As of 2018 data release, HMDA data will contain credit score and other data points previously unavailable, allowing CDOs to better determine lending patterns of institutions	Race & Ethnicity, Income, Lending	Community Development
16. Explore increased opportunity to target job & skills training a. Toward areas with high eviction rates b. To formerly-incarcerated individuals c. Toward mismatched access/skill neighborhoods	Race & Ethnicity, Disability, Income, Education	Community Development
3. Strategy Actions		
1. Research land banking and/or other programs that could alleviate problems of prohibitive land cost of affordable development in areas near transit and other amenities	Race & Ethnicity, Income, Housing Stock, Lending, Public	Community Development, Planning, Economic Development
2. Continue promoting needed unit types in City-assisted housing development and rehabilitation as well as the private market* a. Continue to encourage and fund scattered-site mod/rehab programs b. Continue to encourage universal design units in all new developments	Race & Ethnicity, Age, Disability, Income, Housing Stock, Public	Community Development, Planning, CDA, Civil Rights
3. Research ways to support increased ownership development, especially of lower-cost ownership types (condo, townhome, cohousing, etc.)	Race & Ethnicity, Income, Housing Stock	Community Development, Planning, Zoning
4. Proactively partner with Madison Metropolitan School District to identify potential investment/development areas to be considered for preference in City programs	Race & Ethnicity, Disability, Income, Housing Stock, Education	Community Development, Planning
5. Create and maintain clear Division responsibilities and implementation strategies for coordinated housing, development, and real estate goals of the City a. Create a City Housing Staff Team	Race & Ethnicity, Age, Disability, Income, Housing Stock, Public	Planning, Zoning, Community Development, Economic Development, Civil Rights
6. Research and promote financing & funding opportunities that can be used to finance development of Accessory Dwelling Units a. Ex: Recruit financial institutions to create portfolio loan products to finance ADUs	Income, Age, Housing Stock, Lending	Community Development
7. Explore and maximize opportunities for City to fund affordable homeownership and other tenure-type development (cohousing, co-op, owner-occupied rental, etc.) a. Explore programs that support conversion from affordable rental to affordable condo/ownership models at end of affordability period	Race & Ethnicity, Income, Housing Stock, Lending, Public	Community Development, CDA
8. Research and implement plans to balance preservation of naturally-occurring affordable homeownership options (most likely to be redeveloped) while encouraging higher-density redevelopment types	Race & Ethnicity, Income, Housing Stock	Planning, Community Development

Goals and Actions	Impediment Area	Division
9. Research policies that support and encourage development of affordable ownership and rental options in the private market without City financial assistance	Income, Housing Stock	Community Development, Planning
10. Consider ordinance changes that encourage the development of affordable housing through the zoning code structured to be consistent with State law	Race & Ethnicity, Income, Housing Stock, Public	Planning, Zoning, Community Development
4. Lobbying Actions		
1. Advocate for legislation to increase local control including repeal of preempting legislation (Regional Transportation Authority, tenant protection, etc.)	Legislative	Citywide
2. Advocate for legislation to increase local authority to conduct regular housing inspections, landlord certifications, and landlord registration	Legislative	Citywide
3. Advocate for legislation to increase statewide minimum-wage and local control for localized minimum wages	Legislative	Citywide
4. Continually monitor and advocate for increased funding opportunities at State and Federal levels	Legislative	Citywide
5. Advocate for legislation to require 30-day Notices to Cure or Quit, as well as general tenant-protections in landlord-tenant law	Legislative	Citywide
6. Advocate for legislation to "ban the box" to further employment and housing protections to formerly-incarcerated individuals	Legislative	Citywide

Summary of Actions & Strategies

If implemented collectively, these actions have the potential to further Fair Housing Opportunity in the City of Madison. Although there is no way to comprehensively reverse the history discrimination and disparate advantage, these actions may serve to further incremental processes that open areas and opportunities for members of the Madison community. However, this plan is by nature limited in process. Furthering Fair Housing will require staff and experts across the City to work within their own Divisions to guide equitable policies, as well as to communicate across Divisions to recognize strengths and limitations of particular strategies, as well as to implement solutions as new impediments arise.



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

APPENDIX C

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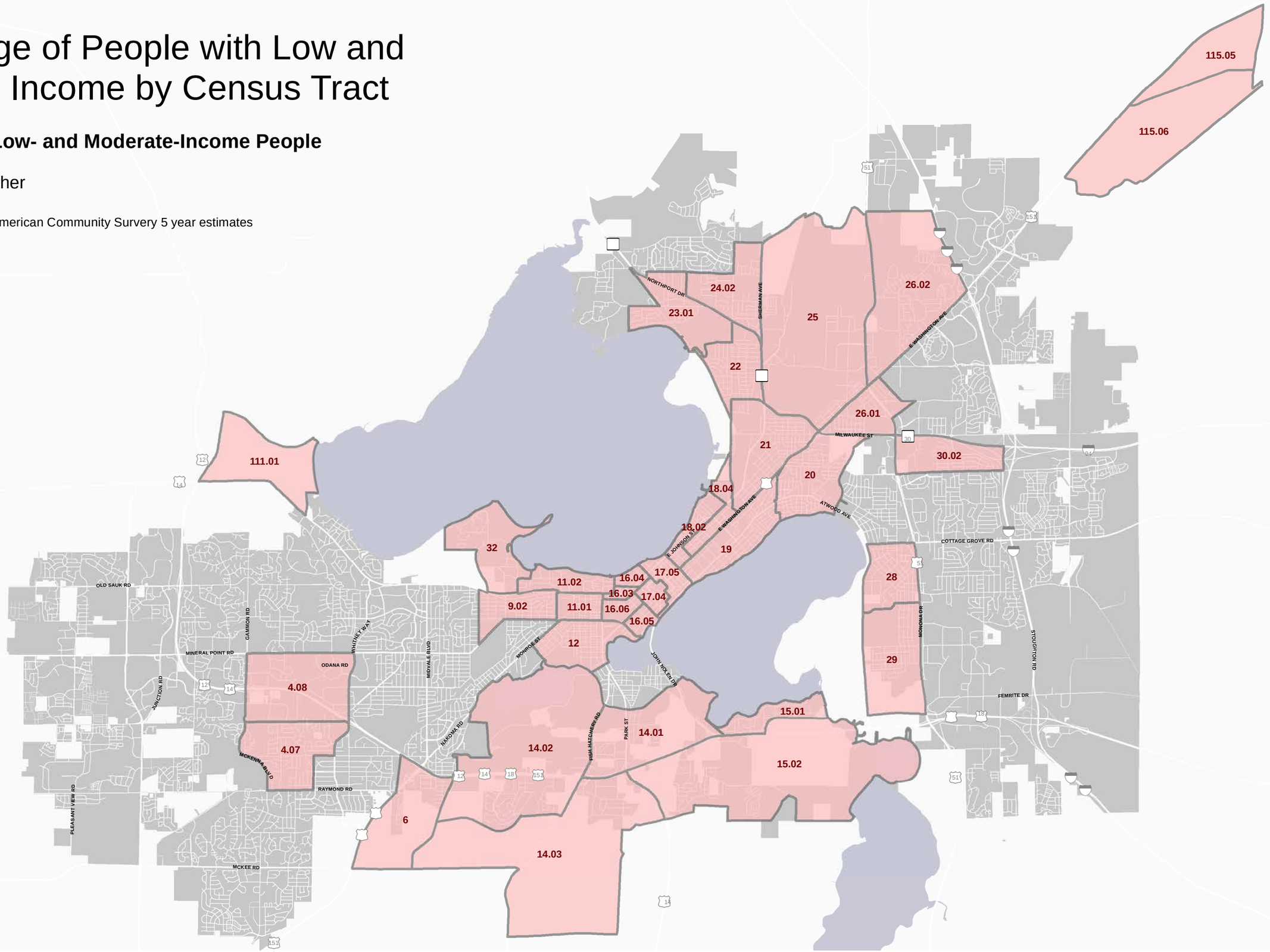
Planning Division: City of Madison Department of Planning & Community & Economic Development, November 14, 2013, slm

Percentage of People with Low and Moderate Income by Census Tract

Percentage of Low- and Moderate-Income People

51 % or Higher

Data Source: 2011-2015 American Community Survery 5 year estimates
Census Tracts



Appendix E

2023 Homelessness Goals

Goal 1: Prevent Homelessness

Actions	Measures	2023 Proposed Achievement
Provide prevention financial assistance and services to low-income households that are most likely to become homeless	Number of households that received homeless prevention financial assistance	10
Expand rapid resolution (diversion) as an empowering approach to preventing homelessness in a manner that ensures safety	Number of households that received emergency shelter diversion services	450
	Percentage of households that received diversion services and did not return to shelters for the following 60 days	60%

Goal 2: Reduce the Length of Time People Experience Homelessness

Actions	Measures	2023 Proposed Achievement
Provide outreach services to individuals and families experiencing homelessness, especially people who are unsheltered, and connect them to permanent housing	Number of households that enrolled in outreach programs	300
	Percentage of households that exited to positive destinations by street outreach programs	50%
Provide housing-focused supportive services at emergency shelters to help people move to permanent housing as quickly as possible	Percentage of individuals that exited to permanent housing by singles shelters	20%
	Percentage of family households that exited to permanent housing by family shelters	65%
	Average length of time individuals and households remain at shelters	60 days
Provide rapid rehousing or other permanent housing rent assistance and/or supportive services to individual and family households	Number of individuals that received rapid rehousing or other permanent housing assistance	200
	Percentage of individual and family households that exit to permanent housing by rapid rehousing or other permanent housing programs	90%

Goal 3: Increase Housing Stability

Actions	Measures	2023 Proposed Achievement
Provide permanent supportive housing to chronically homeless individuals and families including veterans	Number of individuals served in permanent supportive housing programs	200
	Number of family households served in permanent housing programs	45
	Percentage of individual and family households that exited to other permanent housing or retained permanent supportive housing	90%

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/orHMIS funding.

- **Environmental Review Determination of Exemption Form**: Typically, sub-recipients for non-rehab emergency shelter, rapid re-housing, homelessness prevention, and streetoutreach projects will use this form to satisfy their environmental review requirements.
- **Environmental Review Questions**: Typically, sub-recipients receiving funding for emergencyshelter 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 approvedthe 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 restrictionthat 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
    - The value of volunteer time may be determined by each agency; the value must be reasonable and appropriate for the services provided
    - 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 andrequirements 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/boarding 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 offacilities assisted with ESG.

To the maximum extent practicable, sub-recipients must have representationof 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 subsidiaryof 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 belowif 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 ofthe 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 violenceshelter 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 plancompliant 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 ofreligion.
- 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.
    - If a sub-recipient conducts these activities, the activities must be offered separately intime 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 ensureall 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 shelterconversion records must be maintained for a minimum of ten years from initial obligation if thecosts 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 participationrequirements.

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 ofJanuary.

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 requirementfor 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 BOSCOC 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 Monitoringand 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 ofthe 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 bereviewed, 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 Statues • 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 Statues • 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
(1) An individual or family who: 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: 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.
(2) A child or youth who qualifies as “homeless” under one of the following: 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
(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

Homelessness Documentation Requirements	
Category 1: Literally Homeless	• Written observation by outreach worker or written referral by another service provider; OR • Self-certification by individual or head of household seeking assistance; OR • For individuals exiting an institution – one of the above AND: o Discharge paperwork or written/oral referral OR o Written record of intake worker's due diligence to obtain above evidence and 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; OR • For individuals and families leaving a hotel/motel – evidence they lack the financial resources to stay; OR • A documented and verified oral statement. AND • Certification that no subsequent residence has been identified and self-certification 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 AND • Certification of no permanent housing in last 60 days AND • Certification by the individual or head of household and any available supporting documentation that (s)he has moved two or more times in the past 60 days AND • Documentation of special needs or 2+ 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; AND 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 AND • Documentation of one of the eligibility conditions OR • 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:
    - Eligibility for ESG assistance
    - 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:
    - Homeless Prevention assistance (not less than once every 3 months)
    - Rapid Re-Housing assistance (not less than once per year)
- Re-evaluations are required to determine:
    - Program participants' continued eligibility for assistance
    - 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:
    - Have an annual income at or below 30% of CMI
    - 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 assistanceavailable 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 activitiesunder 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 rentand 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 therental assistance agreement
   - Sub-recipient is solely responsible for paying with non-ESG fundsany 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, t sub-recipient mustestablish and follow their formal process which meets all statutory requirements.

1. Sub-recipients may terminate ESG assistance if a participant violatesthe 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 planto 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. Documentationof program income expenditures may be requested during monitoring visits.

DANE COUNTY WRITTEN STANDARDS 2023

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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 housing and housing case management program must be aware of and inform households of the educational rights of children and unaccompanied youth in their programs. Materials explaining rights should be provided to applicable households. Program staff will collaborate with the Transition Education Program (TEP) or other school officials to coordinate educational services. Program staff will highly encourage school attendance and will work with households to address any barriers to regular attendance. If attendance and truancy concerns are noted, program staff will communicate/coordinate with school staff.
6. Each program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; e.g. – gender specific, individuals/families. Each agency will provide information to Coordinated Entry.
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

MINIMUM STANDARDS

1. The frequency of case management services 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.
2. Case management services include, but are not limited to: developing an individualized housing/service plan, assistance with obtaining and maintaining housing, counseling, employment referrals, education, referral and coordination of services, accessing mainstream benefits, and coordinating with schools.

3. Case management service plans will incorporate the participants' expectations and choices for short and long-term goals.
4. Together, the program and program participants will develop a schedule for reassessing the individualized service plan. The reassessments will occur at least annually, and as often as required by the funder.

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 FIRST[1]

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?
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

[1] Program Evaluation taken from:
http://www.allchicago.org/sites/allchicago.org/files/2015%20Project%20Component%20-%20FINAL.pdf

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 housing programs (PSH and RRH) 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 the of 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.
5. Approved transfer requests may be discussed at an appropriate housing placement or case conferencing meeting. Discussion of housing options will be participant-centered.

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.

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 arears 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 arears), 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. STREET OUTREACH

Street outreach workers engage with people experiencing homelessness in order to connect them with emergency shelter, housing, or other critical services. Street outreach services are provided in non-facility-based settings. People experiencing unsheltered homelessness and those who are not engaged in other services are prioritized for street outreach services. ESG-funded street outreach programs can only provide case management services to people experiencing unsheltered homelessness.

ELIGIBILITY CRITERIA

- Participants must meet category 1 – Literally Homeless as outlined by the HUD definition of homelessness.

MINIMUM STANDARDS

1. Support services provided must be focused on:
    a. Getting participants housed (permanent housing, shelter, transitional housing, doubled up, etc.)
    b. Linking participants to mainstream benefits and resources
    c. Maintaining benefits for which participants are eligible
2. Participant engagement – outreach workers will locate, identify, build relationships with people experiencing homelessness, prioritizing people who are unsheltered, and engage them to provide immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
3. Services are not facility-based. Outreach workers will go where services are needed.
4. Programs will address urgent physical needs, such as providing meals, blankets, clothing, or toiletries.

5. Outreach staff will remain connected to participants until they obtain permanent housing or are linked to other supportive services. These may include shelter case management, CCS services or services offered through a housing program. If the worker has initiated contact regularly with a participant and has not had contact for 90 days, the participant must be exited from the program in HMIS.
6. Street outreach workers will be certified by the Coordinated Entry System Manager to act as mobile assessment hubs for the Coordinated Entry System. Once certified, street outreach workers will conduct the VI-SPDAT assessment and make appropriate referrals to the housing priority list.
7. Street outreach workers will participate in bi-monthly outreach meetings.
8. Street outreach workers will gather documentation of a participant's history of homelessness, income and disability status, and collect the Participant Interest Form in order to confirm eligibility for permanent housing placement. Completed documentation will be sent to the Coordinated Entry System Manager.

3. DIVERSION

Diversion[2] 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. 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.

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

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.

4. 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 polices 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.

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

[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)*

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 following[4]:

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 polices 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.

5. 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
    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

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

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.

6. 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.

PARTICIPANT PRIORITIZATION REQUIREMENTS[5]

[5] 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*

Participants will be prioritized based on their chronic homeless status, length of time homeless (capped at 36 months), and VI-SPDAT, VI-F-SPDAT, or TAY-VI-SPDAT score.

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 needs[6].

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:

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

[6] 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 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:

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 in 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.

HOUSING PRIORITY LIST

Following the above prioritization requirements, the Housing Priority List will rank potential participants by chronic homeless status and number of points. The point formula considers a household's length of time homeless (capped at 36 months) and VI-SPDAT score. The number of points are determined by using the following calculation: (number of months of homelessness/12) + VI-SPDAT score = total points.

Further, people who have complete chronic documentation in place with the Coordinated Entry System Manager are prioritized for openings in PSH programs.

RECORD KEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS[7]

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

[7] 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

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

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)

ACCESS TO PSH PROJECTS

All referrals for PSH projects will come through the coordinated entry system and the CoC-wide PSH priority lists for families and individuals.

7. RAPID RE-HOUSING

Rapid rehousing 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 re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are typically tailored to the unique needs of the household.

The core components of a rapid re-housing program are housing identification and relocation, short- and/or medium-term rental assistance and move-in (financial) assistance, and case management and housing stabilization services.

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.[8] According to the National Alliance to End Homelessness, progressive engagement is,

[8] 24 CFR 578.37 and *Core Components of Rapid Re-Housing,* National Alliance to End Homelessness

"A strategy of providing a small amount of assistance to everyone entering the homelessness system. For most households, a small amount of assistance is enough to stabilize, but for those who need more, more assistance is provided. This flexible, individualized approach maximizes resources by only providing the most assistance to the households who truly need it. This approach is supported by research that household characteristics such as income, employment, substance use, etc., cannot predict what level of assistance a household will need."

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- If the household meets category 4, they must also reside in one of the places set forth in category 1 at the time eligibility is determined. Homeless Verification form must be retained in the household's file.
- RRH referrals are generated through the CoC Coordinated Entry process and the CoC-wide priority lists for families and individuals. Participants are prioritized based on VI-SPDAT, VI-F-SPDAT or TAY VI-SPDAT score and length of time homeless (capped at 36 months). When filling program openings, participants are selected from the top of the non-chronic portion of the priority list. Program participants requesting an emergency transfer will be prioritized above any other households for open units (24 CFR 5.2005 (e)(3)).
- At recertification (occurring not less than once annually), participants' household annual income must be at or below 30% CMI and participants must lack sufficient resources and support networks necessary to retain housing without rapid rehousing assistance (24 CFR 578.37(E)).

MINIMUM STANDARDS

1. The maximum length of program participation is 24 months. However, CoC-funded projects may provide supportive services for up to 6 months after rental assistance ends.
    - For ESG/HPP-funded projects the total period for which any program participant may receive rent assistance and services (i.e. housing search and placement, mediation, legal services, and credit repair) must not exceed 24 months during any three year period.
    - For ESG/HPP-funded projects, 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.
    - 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 may set a maximum amount of assistance or maximum number of times assistance is received.
2. Program staff will assist participants in locating housing.
3. Project participants in RRH must enter into a written lease agreement that is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party. Programs may have additional requirements determined by program funding requirements. For example, programs may require a written lease agreement for an initial term of one year.

4. RRH project will use Housing First approaches, following the Minimum Standards listed in the Housing First section of the Written Standards.
5. Financial assistance and case management should be flexible and based on a household's individual needs using progressive engagement.
    - Financial Assistance:
        - In order to help households quickly stabilize in housing, projects may pay up to 100% of move-in costs including security deposit, first month's rent and any required utility payments.* 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 households 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 pro-rated rent in addition to the first month's rent.

          *Participants of RRH funded with Housing Assistance Program (HAP) must pay at least 25% of their gross income toward rent, including security deposit and first month's rent.
        - Following the first month, 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.
        - Projects must have written policies regarding the amount and duration of financial assistance which must be communicated to participants upon project entry.
    - Housing Relocation and Stabilization Services
        - 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 upon project entry.
        - 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.
        - RRH programs will connect households with community resources and mainstream benefits to allow for individual resources to be used for housing costs.
        - Program participants must meet with a case manager not less than once per month. Case management should be flexible and available more often if requested and needed.

6. While working with a participant, if it becomes apparent they have documentation of chronic homelessness, program staff will talk with them about the option of continuing with the program or returning to the priority list for a PSH slot. The program must explain how long it may take to receive PSH.

7. COORDINATED ENTRY

Coordinated Entry is an important process through which people experiencing or at risk of experiencing homelessness can access the crisis response system in a streamlined way, have their strengths and needs quickly assessed, and quickly 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 single adults, households with minor children and unaccompanied youth. 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.[9]

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 though the CoC grant for Coordinated Entry.

ACCESS TO COORDINATED ENTRY

A. FULL COVERAGE

The Coordinated Entry System is accessible throughout Dane County. Assessment hubs are located at The Salvation Army Single Women's and Family Shelter, Porchlight Men's Shelter and the CE office at The Beacon Day Resource Center. Participants can also access CE at The Beacon by calling 608-826-8019. Callers will not be required to present in the CE office. They will be assessed for immediate needs, and when possible, referrals will be given over the phone. The VI-SPDAT assessment should be conducted in person.

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 (i.e. Briarpatch, DAIS, Catholic Multicultural Center, etc.). Additionally, there are monthly mobile assessment hubs provided in areas surrounding the City of Madison. There will be assessment hubs

[9] Opening Doors: Federal Strategic Plan to Prevent and End Homelessness, p. 57

located in geographically diverse sections of Dane County that will be visited as necessary to do VI-SPDATs and provide services.

The Homeless Services Consortium website has up-to-date information regarding access to Coordinated Entry: https://www.danecountyhomeless.org/get-help. Emergency shelter phone numbers can be accessed through the HSC website.

B. EMERGENCY SERVICES

All shelters will participate in Coordinated Entry. All shelters are highly encouraged to assess clients for appropriate permanent housing placement using the VI-SPDAT. If shelters cannot assess clients due to lack of shelter resources, shelters must refer clients to the Coordinated Entry System for assessment, and explain to clients the process of accessing housing programs. All shelters are required to notify clients about how to access Coordinated Entry.

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.

Coordinated Entry staff will provide regular office hours throughout the county to accommodate those in outlying areas. There will be assessment hubs located in geographically diverse sections of Dane County that will be visited as necessary to do VI-SPDATs and provide services. If a household needs to get to Madison for shelter services, staff will contact the CoC Coordinator to explore transportation options.

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 TOOL

In order to achieve fair, equitable and equal access to services in the community, staff at assessment hubs (including mobile hubs), will use the same assessment tool. The Dane County CoC uses the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT). The appropriate version of the tool will be used based on the population of the presenting household (single, family or youth). The VI-SPDAT assesses households based on history of housing and homelessness, risks, socialization and daily functioning and wellness.

B. ASSESSMENT 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. If the household has not self-resolved their housing situation in 7-10 days and fall into one of our community's priorities (see Written Standards, Permanent Supportive Housing, Participant Prioritization Requirements), they will be assessed using the appropriate VI-SPDAT tool and placed on the Housing Priority List. Staff will ensure that the person does not already have an assessment in the system. Households should only be placed on the priority list if they are currently staying in shelter or a place not meant for human habitation. Staff will double check HMIS to ensure that people are properly on or off the list as required, or are added back to the list. If CE staff are aware of a household who is staying in a place not meant for human habitation, staff must inform them of services at The Beacon, emergency shelters, and offer connection to an outreach worker. If the household would like connection to an outreach worker, CE staff must alert outreach staff of the person's location immediately. Outreach staff will make contact within 48 hours.

Staff should not provide households with their VI-SPDAT score. Staff can provide households information about the housing intervention for which they are recommended (for example, Permanent Supportive Housing or Rapid Rehousing) should the household inquire about their assessment.

When a household is referred to the Housing Priority List, the staff making the referral is responsible to follow-up with the household every 30-45 days (starting for all households added to the list after January 22, 2018). Follow-ups must be recorded in the "Coordinated Entry Referral Follow Up" section in the Assessments tab of the client profile in HMIS. Households that do not use emergency shelter or outreach services within the HSC for six months, will be removed from the priority list.

If a household presents as two adults with no minor children, a VI-SPDAT for Single Adults should be completed for each individual. Each individual should be referred to the singles list and it should be noted in HMIS who they would like to live with (under the "Housing Placement Meeting" section in the Assessments tab of the client profile in HMIS). When one person comes up on the Housing Priority List, the outreach worker or CE staff will check in with the person and their significant other individually to be sure they want to live together.

If an unaccompanied youth between the ages of 18 and 24 presents to CE, staff should complete the TAY-VI-SPDAT and refer them to the singles list six months prior to their eighteenth birthday. In addition, CE staff should provide a referral to Briarpatch Youth Services.

A household may be re-assessed with the VI-SPDAT if there is a major life change. A major life change includes, but is not limited to the following: change in household members, change in health status, and additional interactions with emergency services.

If a household re-enters homelessness after being permanently housed, they should be re-assessed.

A household may refuse to complete the assessment. If a household refuses to complete the VI-SPDAT assessment, CE and outreach 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. While working with the household to get further information, CE and outreach staff may make a referral to the Housing Priority List. However, households must complete a CE Release of Information in order to be referred to the Housing Priority List.

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.

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. Participants are able to access the domestic violence hotline by calling 800-747-4045. 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. It is important as people are nearing the top of the Housing Priority List that providers have a sense of what the household wants. Households will be offered the Participant Interest Form to complete. The form must be uploaded in HMIS to be used for placement. Providers must not tell households where they are on the Housing Priority List because it is a fluid list, not a time-bound list. Providers cannot determine when a housing opportunity will become available for the household.

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
- Coordinated Entry Policies and Procedures and Written Standards
- How to Conduct the Coordinated Entry Assessment in HMIS
- How to Initiate the Referral Process in HMIS
- How to Conduct/Enter the VI-SPDAT
- Best Practices for Engagements with Families
- Fair Housing Laws in Dane County
- HUD's Equal Access Rule
- Cultural and Linguistic Competency
- Trauma Informed Care
- Harm Reduction
- Client Confidentiality
- Housing First
- Domestic Violence 101 and Safety Planning

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

- HMIS Licensure
- Coordinated Entry Policies and Procedures and Written Standards
- How to Accept a Referral in HMIS

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.

PRIORITIZATION

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

The Dane County CoC prioritizes Permanent Supportive Housing and Rapid Rehousing for the most vulnerable populations in our community. Households who are experiencing Category 1 – Literally Homeless or Category 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness may be placed on the Housing Priority List. Households placed on the list will be prioritized based on chronic homeless status, length of time homeless (capped at 36 months) and VI-SPDAT score (HUD Notice CPD-14-012). There is one priority list for single adults and one for families with minor children.

People who are experiencing Category 1 or Category 4 homelessness and refuse or are unable to complete the VI-SPDAT may still be referred to the Housing Priority List. If participants refuse or are unable to complete the VI-SPDAT, their prioritization on the list may be affected.

Households may receive a lesser intervention than their score. For example, a household may have a score in the PSH range, but if there are not PSH units available, the household may be offered a Rapid Rehousing intervention if applicable. The purpose is to move households from homelessness to housing as quickly as possible.

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.

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. HOUSING PLACEMENT MEETINGS

There is a Housing Placement meeting for Families with Children. These meetings occur twice each month. The Coordinated Entry Manager leads these meetings. The CE Manager will provide a list of households (de-identified client ID numbers) to discuss one to two days prior to the scheduled meeting. If someone is working with a household on this list, they must attend the meeting or make advance arrangements with the CE Manager. Housing providers will provide a list of vacancies and potential transfers to the CE Manager one to two days prior to the scheduled meeting. A representative from each housing provider must be present at each meeting. If a representative is not available, advance arrangements must be made with the CE Manager.

There are not Housing Placement meetings for Single Adults. As soon as a housing provider is aware of an opening in their program, they must contact the Coordinated Entry Manager. The CE Manager runs the Housing Priority List for Single Adults and sends the housing provider the name of the household at the top of the Housing Priority List with all of their documentation completed (see Permanent Supportive Housing section) and what outreach worker they are connected to. When a household is at the top of the priority list and a match has been identified, their preferences must be considered by accessing their Participant Interest Form. A housing option can be rejected by a household. The household does not lose their spot on the list for rejecting an option. There is no limit to the number of times a household may reject a placement.

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.

B. CONTACTING PEOPLE ON THE HOUSING PRIORITY LIST

If staff is completing data clean-up of the Housing Priority List to see if people are still in need of housing, there will be times when staff is unable to make contact with the person. Staff must attempt contact at least three times over the course of a 30-day period. Contacts must be recorded in the "Coordinated Entry Referral Follow Up" section in the Assessments tab of the client profile in HMIS. Contacts can be made via telephone, text, or e-mail. Staff must also reach out to the following applicable entities: outreach providers, placement meeting providers and school district or Head Start staff. If no one is able to contact the household, staff will cancel the referral to the Housing Priority List.

Best practices for contacting clients:

- Attempt contact during different times of the month (beginning, middle, end).
- Contacts should be made over the course of 30 days, not all in one week.
- If staff is able to text, please try this as someone's phone may be out of minutes, but they can still send and receive text messages.
- Bring the name to the outreach meeting and placement meeting to see if anyone has information.
- Check the VINE system to see if the person is incarcerated.
- If your agency allows, staff may use an agency Facebook page to attempt contact.

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. (See "Best practices for contacting clients" above, under Contacting People on the Housing Priority List.) There may be circumstances where two agencies work together to connect with someone. It is the receiving agency's responsibility to ensure contact. Staff must attempt to contact a participant three times during seven business days. All attempts must be documented in HMIS under the Coordinated Entry Referral Follow Up section. If staff attempts contact on three occasions during the seven business days and does not get a response, they may move to the next household on the priority list.

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 Housing Priority List. 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 receive household consent, written or verbal, through an HMIS Release of Information before sharing household information in HMIS. All shared information is for the purpose of assessing and referring households to housing and services provided through the Coordinated Entry process. The only information to be shared is that for which the household has provided consent. Households will not be denied services for refusal to have their information shared in HMIS.

EVALUATION

Annually, the HSC will conduct an evaluation of the Coordinated Entry System. The evaluation will include a review of the CE policies and procedures, assessment by households accessing the system and feedback from housing and service providers. The evaluation will look at the intake, assessment and referral process of Coordinated Entry. All participating agencies will be asked to evaluate the system. Surveys will be distributed to households at participating agencies including, but not necessarily limited to The Beacon, The Salvation Army, Porchlight Men's Shelter and Tenant Resource Center 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 annual 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 changes to the CE System.

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.

The Core Committee and HSC Board of Directors will review the CoC's System Performance Measures every six months, consider how the system is affecting Performance Measures and what changes can be implemented to improve performance.

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

Community Plan to Prevent and End Homelessness
https://www.danecountyhomeless.org/governance

Community Solutions – Built for Zero
https://community.solutions/

Dane County Homeless Services Consortium
http://www.danecountyhomeless.org/

National Alliance to End Homelessness
http://www.endhomelessness.org/

National Center for Homeless Education
https://nche.ed.gov/

National Health Care for the Homeless Council: Engaging Youth Experiencing Homelessness
https://nhchc.org/wp-content/uploads/2019/08/engaging-youth-experiencing-homelessness.pdf

National Law Center on Homelessness and Poverty
https://nlchp.org/

State of Wisconsin – EHH Funding
https://doa.wi.gov/Pages/LocalGovtsGrants/Emergency-Solutions-Grant-Transitional-Housing-Program-Homelessness-Prevention-Program-ETH.aspx

U.S. Department of Education – McKinney-Vento
https://www2.ed.gov/policy/elsec/leg/esea02/pg116.html

U.S. Department of Housing and Urban Development, HUD Exchange
https://www.hudexchange.info/

U.S. Department of Veterans Affairs
https://www.va.gov/

U.S. Interagency Council on Homelessness
https://www.usich.gov/

APPENDIX H: 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).

Supplemental Written Standards for use during the COVID-19 public health emergency

During the COVID-19 public health emergency, CoC-, ESG- and EHH-funded projects must continue to follow the Dane County Written Standards (2020). The standards below will override applicable current Dane County Written Standards through the end of the public health emergency unless otherwise stated.

The Department of Housing and Urban Development (HUD) has issued notices of waivers to current regulations that CoC-and ESG-funded projects can use. Below is a list of the notices:

March 31, 2020
September 30, 2020
December 30, 2020
March 31, 2021
June 30, 2021
December 30, 2021

Individual projects must notify HUD of their intention to use the waivers. If HUD issues additional COVID-19 related waivers or changes in the regulations, agencies will be allowed to adopt the changes prior to the Dane County Written Standards getting updated and approved by the Board of Directors.

Permanent Supportive Housing

1. For projects that notified HUD of use of this waiver, projects are not required to have participants enter into a lease agreement for a term of at least one year. The initial lease term must be for at least one month. This is applicable to leases executed between December 30, 2021 and March 31, 2022.
2. For PSH projects that notified HUD of use of the waiver for disability documentation, projects that prioritize people experiencing chronic homelessness, do not need to have third party documentation of a disability if the public health crisis prevents the participant from obtaining one. A written certification by the individual seeking assistance that they have a qualifying disability is considered acceptable documentation. Expires 3/31/22. Recipients will NOT need to obtain additional evidence to verify intake staff-recorded observation.

Prevention

1. For projects that notified HUD of use of Waiver 11, the requirement to re-evaluate participants receiving short-term rental assistance is waived. Re-evaluations must occur not less than once every 6 months. Expires 3/31/22.
2. When using COVID-19 funds, eligibility criteria for prevention assistance will not require a previous episode of homelessness. Households with a previous episode of homelessness will be prioritized for assistance.
3. When using ESG-CV funds, households receiving prevention assistance cannot have an annual income that exceeds 50% of county median income.

Rapid Rehousing

1. For CoC-funded projects that notified HUD of use of Waiver 7 in the 12/30/21memo, the 24-month rental assistance restriction is waived. Participants who reach 24 months of rental assistance before 3/31/22 can receive ongoing assistance if they are unable to afford their rent without the assistance. Expires 3/31/22.

Transitional Housing & Other Permanent Housing

1. During the public health emergency, transitional housing and other permanent housing programs serving households with children will prioritize households staying in emergency shelter or in hotels paid for with emergency shelter funds. All other prioritization elements will remain the same.

Homeless Definition

1. Regarding temporary stays in institutions.
    a. An individual may qualify as homeless so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. Expires 3/31/22.

APPENDIX G

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 a 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).