



**City of Madison**

*Satya Rhodes-Conway, Mayor*

**Department of Planning and  
Community & Economic Development**

*Nan Fey, Interim Director*

**Community Development Division**

*Jim O'Keefe, Director*



# City of Madison, Wisconsin **2019 Action Plan**

for the period **January 1, 2019** through **December 31, 2019**

*Planned investments in community & neighborhood development projects and related efforts  
toward achieving the objectives described in Madison's 2015-2019 Consolidated Plan*

**City of Madison Community Development Division**

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# 2019 Action Plan

## City of Madison, Wisconsin

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### *Acknowledgements*

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**SATYA RHODES-CONWAY**  
Mayor, City of Madison

**NAN FEY**

Interim Director, Department of Planning and Community & Economic Development

<b>COMMUNITY DEVELOPMENT DIVISION</b>	<b>COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) COMMITTEE</b>			
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	<th data-bbox="846 1625 1515 1682"><b>COMMUNITY DEVELOPMENT AUTHORITY</b></th> <tr><td data-bbox="107 1688 824 1766"></td><td data-bbox="846 1688 1515 1766"><p><b>TOM CONRAD</b>, Interim Director</p></td></tr>	<b>COMMUNITY DEVELOPMENT AUTHORITY</b>		<p><b>TOM CONRAD</b>, Interim Director</p>
	<p><b>TOM CONRAD</b>, Interim Director</p>			

This document is available online at:

[www.cityofmadison.com/cdbg/documents/2019 Action Plan.pdf](http://www.cityofmadison.com/cdbg/documents/2019_Action_Plan.pdf)

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## Executive Summary

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### 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, 2019 through December 31, 2019. 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 and HUD Continuum of Care (CoC) funds.

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 2019 Action Plan includes the four goals outlined below, targeting community needs related to affordable housing, economic development and employment, and strengthening neighborhoods.

Goal 1 - Affordable Housing: Provide decent, safe and sanitary affordable housing opportunities for low- and moderate-income households in order to enhance household, neighborhood and community stability.

- **Objective 1.1: Housing Supply**  
Preserve, improve and expand the supply of affordable housing for homeowners and renters.
- **Objective 1.2: Housing Assistance**  
Improve housing stability for homebuyers, renters, homeless and special needs populations.



Goal 2 - Economic Development & Employment Opportunities: Expand employment opportunities and enhance neighborhood vitality by supporting new and existing businesses.

- **Objective 2.1: Job Creation and Community Business Development**  
Create jobs, particularly for under-represented individuals, by supporting new or expanding businesses.
- **Objective 2.2: Small Business Development**  
Assist entrepreneurs, particularly those from under-represented populations, seeking to start or grow small businesses and micro-enterprises (as defined by HUD) that create jobs.
- **Objective 2.3: Adult Workforce Preparedness**  
Provide needed support and opportunities to help individuals overcome barriers to gainful employment and achieve economic stability.

Goal 3 - Strong & Healthy Neighborhoods: Strengthen neighborhoods through strategic investments in physical assets and amenities like neighborhood centers, community gardens or other community facilities, as well as other planning and revitalization efforts.

- **Objective 3.1: Neighborhood Centers & Community Gardens**  
Create, enhance, or sustain the development and operation of physical assets, such as neighborhood centers, community gardens or other physical amenities that help bring people of diverse backgrounds together, serve as neighborhood focal points, or help residents develop skills or take advantage of opportunities that will strengthen neighborhoods.
- **Objective 3.2: Capital Improvements for Community Organizations**  
Create or improve safe, accessible, energy-efficient and well-maintained community and neighborhood facilities.
- **Objective 3.3: Neighborhood Revitalization Plans & Projects**  
Help residents within designated neighborhoods identify, plan for and implement projects and activities that promise to enhance the quality of life for neighborhood residents.

Goal 4 - Program Administration: Administer the Community Development program to meet community needs and funder requirements by developing, guiding and managing activities that generate long-term impact and self-sufficiency.

This Action Plan allocates a total of approximately \$10.8 million in anticipated 2019 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 \$16.6 million in pre-2019 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 2018, the fourth year of the City's current 2015-2019 Consolidated Plan, the Community Development Division invested over \$7 million in the community to meet the goals and objectives outlined in the City's 2018 Action Plan. CDBG, HOME and ESG funds were targeted primarily toward affordable housing, economic development and employment opportunities, and strong and healthy neighborhoods.

Consolidated Annual Performance and Evaluation Reports (CAPERs) for previous program years are available on the City's website at [www.cityofmadison.com/cdbg/doc\\_library.htm](http://www.cityofmadison.com/cdbg/doc_library.htm), 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 2019 Action Plan and its 2015-2019 Consolidated Plan with consultation from a diverse group of individuals and organizations. A public hearing on a draft 2019 Action Plan was held on May 2, 2019. The Action Plan flows from the 2015-2019 Consolidated Plan, which was approved by HUD in July of 2015. Activities included in the 2019 Action Plan were approved at publicly noticed meetings of the CDBG Committee and Common Council. Final approval of 2019 funds took place on November 13, 2018, as part of the City of Madison's 2019 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 2019 Action Plan period, the City conducted nine focus group meetings between November 11, 2013 and January 16, 2014 to gather input regarding Madison's top community development needs. Citizen participation was also solicited through an electronic survey sent to over 700 email recipients, forwarded through a community listserv, and made available on the City of Madison's homepage, accessible via Dane County public library computers. Paper copies of the survey were distributed to libraries, public housing sites and homeless shelters. A total of 954 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 was 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 November 14, 2013 to solicit public comment on needs, trends, and potential obstacles for 2015-2019. An additional public hearing to solicit input on the draft 2015-2019 Consolidated Plan was held on October 9, 2014. Finally, the Plan was provided to the Common Council on December 2, 2014, 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

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### 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(l)).*

A public hearing on the draft 2019 Action Plan was held on May 2, 2019. In addition, numerous focus groups, general meetings and two public hearings were held as part of the larger planning process for the 2015-2019 Consolidated Plan. The 2019 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 all 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 Community Gardens, Housing Strategy, Civil Rights, Urban Design and Planning, Economic Development, 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
- Funding organizations
- Homeless shelters and providers
- 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.
- 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 as part of 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**.

*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 federal CoC application to HUD, and also serves as the lead administrator for CoC data collection. The City also currently provides staffing for 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 2019, 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 long supported—and will continue to give preference to—projects that develop permanent supportive housing units that serve special needs populations. An example is the City's commitment to the expansion of the CoC's permanent supportive housing supply. The City provided financial support to develop 60 PSH units for single individuals at Rethke Terrace, the construction of which was completed in 2016. In 2018, the City provided support to the same housing developer to complete a 45-unit building to provide PSH units to families experiencing homelessness. In 2019, the City will continue these efforts by prioritizing developers who partner with service agencies serving homeless households during the Affordable Housing Fund Request for Proposals. The City also uses General Purpose Revenue and Emergency Solutions Grants to fund outreach efforts that connect chronically homeless youth and adults with housing and services provided by CoC agencies.

These services include:

- Case management
- Daytime shelter
- Eviction prevention
- Job training
- Legal advocacy and mediation
- Mental illness case management
- Rapid re-housing
- Sober living programs
- Transitional housing
- Fair housing

The City also provides significant support for the local coordinated entry intake process, with the goal of bolstering access to housing and related services for vulnerable underserved populations such as veterans, youth and families. The immediate goal of this system is to move more individuals from homelessness to stable housing as quickly as possible.

Committed to ending youth homelessness, the City will partner with the HSC in 2019 to apply, for the first time, for funds through HUD's Youth Homelessness Demonstration Program (YHDP). The Community Development Division is proud to be partnering with the Dane County Homeless Services Consortium and the Youth Action Board of Dane County to apply to be one of 25 communities that will participate in this innovative HUD program to prevent and end youth homelessness. If awarded funds, the City (as the lead applicant) will support a full-time LTE position for up to 2 years that will help with planning and implementation of services focused on ending youth homelessness.

***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.***

In its role as partner in the Dane County CoC, the City of Madison ensures that City staff either participates in or shares a leadership role on CoC activities. The Dane CoC Coordinator is a City employee who supplies support to the CoC, and provides guidance for planning purposes to CDD. In conjunction with the CoC Board, a set of written standards has been developed for use in developing proposals for homeless facilities and services, when developing funding recommendations, and when administering ESG and other homeless-focused funds. CDD uses these standards when preparing funding recommendations and consults with the Board about funding priorities before releasing a Request for Proposals. Through an email distribution list, HSC members are regularly notified of key CDBG Committee meetings where input is being solicited on plans and performance outcomes.

Notifications regarding City funding processes are sent via e-mail distribution and newspaper advertisement. 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. Quarterly, the CoC's Performance Committee reviews information from the Homeless Management Information System (HMIS) to determine program effectiveness. As part of the HMIS process, the City facilitates the HMIS operations of the CoC through its representation on the HMIS Advisory Board. This role includes City staff participation in the development of funding policies and procedures related to administration of the HMIS system within Wisconsin. The City currently contributes approximately 2% of its annual federal ESG allocation and a portion of its state funding 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.***

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

**Table 2 – Agencies, groups, organizations who participated**

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

As part of the 2019-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*

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
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. <i>(See Appendix B.)</i>
City of Madison Housing Strategy Report	Community Development Authority of City of Madison	Housing Strategy Report-related issues have been considered and are addressed within the Plan's "Affordable Housing" goal
Economic Development Strategy	City of Madison Economic Development Division	Related economic development issues are addressed as part of the Plan's "Economic Development & Employment Opportunities" goal.
2014 Neighborhood Center Study	City of Madison Community Development Division	Neighborhood Centers are addressed as part of the Plan's "Strong & Healthy Neighborhoods" goal.
Race to Equity	Wisconsin Council on Children and Families	Under-resourced and disconnected neighborhoods are addressed as part of the Plan's "Strong & Healthy Neighborhoods" goal. Workforce challenges are addressed as part of the Plan's "Economic Development & Employment Opportunities" 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 eleven membership slots, designating three 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 2019 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/cdbg](http://www.cityofmadison.com/cdbg)) 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.
- Advertising in the community newspaper (*Wisconsin State Journal*) and in culturally specific local publications such as *The Madison Times*, *Capital City Hues* and *La Comunidad*.
- 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 at an array of public libraries 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 community newspapers, and 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 2019 programs and contracts on the CDBG Unit's website on January 1, 2019. 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 2019 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 public's first opportunity to provide feedback on 2019 funding was provided in January. The Community Development Division provided more than 30 days for citizen participation when soliciting feedback on its funding actions for 2019.

In addition to the stakeholder outreach, public meetings and public hearings that were held as part of the 2014 summer funding process and 2015-2019 Consolidated Plan process, the City of Madison's Citizen Participation Plan requires that the draft Action Plan be published for 15 days for written public comments and that a Public Hearing be held prior to final approval by the City's Common Council.

The 2019 Action Plan was posted on the Community Development Division's website on April 26, 2019, after HUD's 2019 allocation announcement, to ensure correct funding amounts were announced to the public. A notice was also posted in newspapers on May 1, 2019, listing the website and the location, date and time of the Public Hearing. Public comments on the plan were accepted until May 20, 2019, at which time Council authorized final approval. The City of Madison received no comments from the public regarding its 2019 Action Plan.

The following specific outreach efforts and meetings were conducted regarding the 2019 Action Plan.

<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary</b>
Newspaper Advertisements	Minorities Non-targeted/broad community	A newspaper ad was placed in the <i>Wisconsin State Journal</i> , announcing the May 2, 2019 public hearing, and soliciting input from the public on the draft 2019 Action Plan.

Mode of Outreach	Target of Outreach	Summary
Public Hearing	Non-targeted/broad community	<p>A Public hearing on the draft Plan was held on May 2, 2019 at the CDBG Committee meeting.</p> <p>A draft of the Plan was posted and made available for review. The public was notified of the meeting by newspaper ads that the City placed in the <i>Wisconsin State Journal</i>, social media and through email distribution. The CDBG Office website also contained information about the meeting. The widely distributed CDBG Committee agenda also included notice and information about the public hearing.</p> <p>Citizens were given the opportunity to attend the meeting, send their comments by mail or email, or contact the CDBG Office. No citizen comments were received at this public hearing.</p>
Internet Outreach	Non-targeted/broad community	<p>Throughout the citizen participation period, the City's draft 2019 Action Plan was posted for public comment on the City's website, along with a copy of the adopted 2015-2019 Consolidated Plan and information about how to participate in related public processes.</p>
Public Meeting	Non-targeted/broad community	<p>A publicly noticed meeting of the City Finance Committee was held on May 13, 2019. Approval of the 2019 Action Plan was listed on the agenda for action.</p> <p>The Finance Committee voted to recommend approval of the City of Madison, Wisconsin 2019 Action Plan.</p>
Public Meeting	Non-targeted/broad community	<p>A publicly noticed meeting of the Madison Common Council was held on May 21, 2019. Approval of the 2019 Action Plan was listed on the agenda for action.</p> <p>The Common Council voted to approve the City of Madison, Wisconsin 2019 Action Plan and authorize its submittal to HUD.</p>

**Table 4 – Citizen Participation Outreach**

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

## Annual Action Plan

### AP-15 Expected Resources

24 CFR 91.220(c)(1,2)

The anticipated resources articulated in this Action Plan are based on assumptions about 2019 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 5				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	1,889,625	1,206,425	1,952,559	5,048,609	0	Estimated five-year average annual CDBG Entitlement allocation: \$1,503,068
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,378,974	984,553	4,116,468	6,479,995	0	Estimated five-year average annual HOME PJ allocation: \$679,530
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	159,201	0	1,272	160,473	0	Estimated five-year average annual HESG Entitlement allocation: \$145,995

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
Future Madison	private	Services	19,761	0	0	19,761	0	Estimated five-year average annual Future Madison allocation: \$18,716
EHH (ESG, HPP, HAP)	public - state	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Services Transitional housing Other	528,379	0	0	528,379	0	Estimated five-year average annual state EHH allocation: \$363,053
HCRI	public - state	Homebuyer assistance	253,200	196,409	95,000	544,609	0	Estimated \$300,000 awarded per 2-year HCRI grant period
City of Madison	public - local	Housing Services	4,169,130	0	10,830,000	14,999,130	0	Estimated five-year average annual City allocation: \$2,168,366

**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 \$3.4 million for the 2019 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.

Goals Summary Information

Sort Order	Objective Name	Start Year	End Year	Category	Goal Addressed	Funding	Outcome Indicator
1	Housing Supply	2019	2019	Affordable Housing	Affordable Housing	CDBG: \$1,121,104 HOME: \$5,655,396 City of Madison: \$10,845,000	591 units of rental housing constructed or rehabilitated  3 unit of homeowner housing added  112 units of homeowner housing rehabilitated
2	Housing Assistance	2019	2019	Affordable Housing Homeless Non-Homeless Special Needs	Affordable Housing	CDBG: \$397,951 HOME: \$530,892 ESG: \$148,533 City of Madison: \$1,718,606 EHH (ESG / HPP / HAP): \$520,318 HCRI: \$506,629	48 homebuyers provided with direct financial assistance  665 homeless persons assisted with overnight shelter  750 persons assisted through homelessness prevention services  4,528 persons assisted with other homeless services or housing resources
3	Job Creation and Community Business Development	2019	2019	Non-Housing Community Development	Economic Development and Employment Opportunities	CDBG: \$1,300,000	23 jobs created
4	Small Business (Micro-Enterprise) Development	2019	2019	Non-Housing Community Development	Economic Development and Employment Opportunities	CDBG: \$460,177	430 businesses assisted
5	Adult Workforce Development	2019	2019	Non-Housing Community Development	Economic Development and Employment Opportunities	City of Madison: \$779,080	1,300 job-seekers assisted through employment training
6	Neighborhood Centers and Community Gardens	2019	2019	Non-Housing Community Development	Strong and Healthy Neighborhoods	CDBG: \$365,130 City of Madison: \$1,256,444 Future Madison: \$19,761	32,365 persons assisted through participation in neighborhood centers and/or gardens activities

Sort Order	Objective Name	Start Year	End Year	Category	Goal Addressed	Funding	Outcome Indicator
7	Capital Improvements for Community Organizations	2019	2019	Non-Housing Community Development	Strong and Healthy Neighborhoods	CDBG: \$660,167	17,850 persons assisted through the creation or improvement of Public Facilities or Infrastructure
8	Neighborhood Revitalization Plans and Projects	2019	2019	Non-Housing Community Development	Strong and Healthy Neighborhoods Effective Planning and Program Administration	CDBG: \$267,942	2,278 persons assisted through concentration neighborhood planning efforts and associated revitalization activities
9	Planning and Administration	2019	2019	Planning / Administration	Effective Planning and Program Administration	CDBG: \$476,138 HOME: \$293,707 ESG: \$11,940 City of Madison: \$400,000 EHH (ESG / HPP / HAP): \$8,061 HCRI: \$37,980	111 contracts managed by CDD staff

**Table 6 – Goals & Objectives Summary**

**Objective Descriptions**

1	<b>Objective Name</b>	Housing Supply
	<b>Description</b>	Preserve, improve and expand the supply of affordable housing for homeowners and renters.
2	<b>Objective Name</b>	Housing Assistance
	<b>Description</b>	Improve housing stability for homebuyers, renters, homeless and special needs populations.
3	<b>Objective Name</b>	Job Creation and Community Business Development
	<b>Description</b>	Create jobs, particularly for under-represented individuals, by supporting new or expanding businesses.
4	<b>Objective Name</b>	Small Business (Micro-Enterprise) Development
	<b>Description</b>	Assist entrepreneurs, particularly those from under-represented populations, seeking to start or grow small businesses and micro-enterprises (as defined by HUD) that create jobs.
5	<b>Objective Name</b>	Adult Workforce Development
	<b>Description</b>	Provide needed support and opportunities to help individuals overcome barriers to gainful employment and achieve economic stability.



6	<b>Objective Name</b>	Neighborhood Centers and Community Gardens
	<b>Description</b>	Create, enhance, or sustain the development and operation of physical assets, such as neighborhood centers, community gardens or other physical amenities that help bring people of diverse backgrounds together, serve as neighborhood focal points, or help residents develop skills or take advantage of opportunities that will strengthen neighborhoods.
7	<b>Objective Name</b>	Capital Improvements for Community Organizations
	<b>Description</b>	Create or improve safe, accessible, energy-efficient and well-maintained community and neighborhood facilities.
8	<b>Objective Name</b>	Neighborhood Revitalization Plans and Projects
	<b>Description</b>	Help residents within designated neighborhoods identify, plan for, and implement projects and activities that promise to enhance the quality of life for neighborhood residents.
9	<b>Objective Name</b>	Planning and Administration
	<b>Description</b>	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 101 low- and moderate-income families will be provided affordable housing, as defined by HOME 24 CFR 91.215(b). These projects include Habitat for Humanity, Movin' Out's Homeownership Program and The Royal Apartments, and Madison Development Corporation.

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.

**Projects**

#	Project Name
1	Owner-Occupied Housing Rehab
2	Rental Housing Development
3	Owner-Occupied Housing Development
4	Homebuyer Assistance
5	Homeless and Special Needs Populations
6	Housing Resources
7	Job Creation & Community Business Development
8	Small Business (Micro-Enterprise) Development
9	Adult Workforce Preparedness
10	Neighborhood Centers & Community Gardens
11	Capital Improvements for Community Organizations
12	Neighborhood Revitalization Plans & Projects
13	Overall Program Administration
14	ESG19 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 2015-2019 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 2015-2016 RFP process, the City received funding proposals for 2016 requesting over \$4.2 million, in which only an estimated \$2.6 million was projected to be available.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Owner-Occupied Housing Rehab
	<b>Objectives Supported</b>	Housing Supply
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$333,216 City of Madison: \$15,000
	<b>Description</b>	Preserve and Improve the supply of affordable housing for homeowners
	<b>Planned Activities</b>	Deferred Payment Loan Program PH Home Repair Program
2	<b>Project Name</b>	Rental Housing Development
	<b>Objectives Supported</b>	Housing Supply
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$536,306 HOME: \$2,765,851 City of Madison: \$10,430,000
	<b>Description</b>	Preserve, improve and expand the supply of affordable housing for renters
	<b>Planned Activities</b>	CommonBond Point Place <i>(formerly Tree Lane)</i> Senior Housing GC Valor on Washington Rental Housing GC/UCA Generations <i>(formerly GrandFamily)</i> Rental Housing @ Union Corners MDC The Avenue Rental Housing Expansion MO The Royal Apts <i>(formerly Madison on Broadway)</i> Rental Housing MSP Normandy Square Rental Housing MSP The Grove Apts Rental Housing PH Prairie Crossing Rental Housing Rehab SHD Fair Oaks Apts Rental Housing SHD Schroeder Rd Apts Rental Housing Housing Development Reserve Fund activities TBD
3	<b>Project Name</b>	Owner-Occupied Housing Development
	<b>Objectives Supported</b>	Housing Supply
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$251,582 HOME: \$2,889,545 City of Madison: \$400,000
	<b>Description</b>	Expand the supply of affordable housing for homeowners
	<b>Planned Activities</b>	Linden CohoMadison Cohousing Community WPHD Lease-To-Purchase Program WPHD Single Family Housing Development Housing Development Reserve Fund activities TBD
4	<b>Project Name</b>	Homebuyer Assistance
	<b>Objectives Supported</b>	Housing Assistance
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$305,109 HOME: \$530,892 HCRI: \$506,629
	<b>Description</b>	Improve housing stability for homebuyers
	<b>Planned Activities</b>	Home-Buy The American Dream (HBAD) Program Habitat Affordable Homeownership for Families MO Homeownership Program

5	<b>Project Name</b>	Homeless and Special Needs Populations <span style="float: right;"><i>[also see Project #14]</i></span>
	<b>Objectives Supported</b>	Housing Assistance
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	City of Madison: \$1,365,943 EHH (ESG / HPP / HAP): \$520,318
	<b>Description</b>	Improve housing stability for renters, homeless and special needs populations
	<b>Planned Activities</b>	DCHS The Beacon Support HAH Rethke Terrace Supportive Services HI Permanent Housing Supportive Services ICA Dane CoC Coordinated Entry Porchlight Dwelling Intervention Grants & Sustenance (DIGS) Porchlight Permanent Housing Case Management Porchlight Shelter Case Management Porchlight Street Outreach Porchlight Transit for Economic Self-Sufficiency (TESS) / Transit for Jobs Sankofa/OWH Housing-Focused Street Outreach & Restorative Justice Tellurian ReachOut PATH Match TRC Quick Move-In TRC Rapid Rehousing TRH Moving Up TRH Reducing Barriers Fund TSA Diversion Case Manager TSA Single Women/Warming House Case Management YWCA Family Shelter YWCA Tree Lane Family Supportive Housing Project Additional supportive services TBD @ Tree Lane PSH Rent subsidy, shelter, and homelessness prevention activities TBD through 2019-20 state RFP process
6	<b>Project Name</b>	Housing Resources
	<b>Objectives Supported</b>	Housing Assistance
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$92,842 City of Madison: \$352,663
	<b>Description</b>	Provide information or other non-monetary resources to LMI persons, and support access to affordable housing opportunities
	<b>Planned Activities</b>	FHC Fair Housing Services IL Home Modification LAW Eviction Defense Project (General) TRC Bilingual Housing Counseling TRC Housing Counseling, Outreach and Education TRC Housing Mediation Services Financial Literacy / Homebuyer Readiness Education TBD
7	<b>Project Name</b>	Job Creation & Community Business Development
	<b>Objectives Supported</b>	Job Creation and Community Business Development
	<b>Goals/Needs Addressed</b>	Economic Development and Employment Opportunities
	<b>Funding</b>	CDBG: \$1,300,000
	<b>Description</b>	Create jobs, especially for under-represented individuals, by supporting new or expanding businesses
	<b>Planned Activities</b>	CWD MSI Roof Replacement MDC Business Loan Program Economic Development Reserve Fund activities TBD

8	<b>Project Name</b>	Small Business (Micro-Enterprise) Development
	<b>Objectives Supported</b>	Small Business (Micro-Enterprise) Development
	<b>Goals/Needs Addressed</b>	Economic Development and Employment Opportunities
	<b>Funding</b>	CDBG: \$460,177
	<b>Description</b>	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
	<b>Planned Activities</b>	LCC Small Business Technical Assistance MBCC Smarter Black Businesses WWBIC Business Development Loans Economic Development Reserve Fund activities TBD
9	<b>Project Name</b>	Adult Workforce Preparedness
	<b>Objectives Supported</b>	Adult Workforce Development
	<b>Goals/Needs Addressed</b>	Economic Development and Employment Opportunities
	<b>Funding</b>	City of Madison: \$779,080
	<b>Description</b>	Provide needed support and opportunities to help individuals overcome barriers to gainful employment and achieve economic stability
	<b>Planned Activities</b>	CWD Southwest Transitional Employment Program (STEP) GCC Supporting Successful Employment KH Adult Resource Development LCEC Building Employment and Technology Skills (BEATS) LN College Success Employment Training LN Skills in Computers and Literacy for Employment MUM Just Bakery Omega GED Preparation and Basic Skills Instruction ULGM ADVANCE Employment Services ULGM Construction Employment Initiative Vera Industry-Specific Training Vera LAWD Education Advancement Vera Workforce Essentials WRTP Construction Liaison Project (CEI / Big Step) YWCA Yweb Career Academy

10	<b>Project Name</b>	Neighborhood Centers & Community Gardens
	<b>Objectives Supported</b>	Neighborhood Centers and Community Gardens
	<b>Goals/Needs Addressed</b>	Strong and Healthy Neighborhoods
	<b>Funding</b>	CDBG: \$365,130 City of Madison: \$1,256,444 Future Madison: \$19,761
	<b>Description</b>	Create, enhance or sustain the development and operation of physical assets, such as neighborhood centers, community gardens or other physical amenities that help bring people of diverse backgrounds together, serve as neighborhood focal points, or help residents develop skills or take advantage of opportunities that will strengthen neighborhoods
	<b>Planned Activities</b>	Bayview Center Support BGC Allied Neighborhood Center Support BGC Taft Neighborhood Center Support BLPW Neighborhood Center Support CGW Community Garden Leadership Development & Self-Management CRC Resilience Neighborhood Center Support EMCC Neighborhood Center Support GCC Neighborhood Center Support KH Neighborhood Center Support LCEC Neighborhood Center Support MSCR Meadowridge Neighborhood Center Support NH Neighborhood Center Support ULGM PE/PR Neighborhood Employment Center Operations/Support VCNC Neighborhood Center Support Wil-Mar Neighborhood Center Support WYC EPNC Neighborhood Center Support WYC TT Neighborhood Center Support
11	<b>Project Name</b>	Capital Improvements for Community Organizations
	<b>Objectives Supported</b>	Capital Improvements for Community Organizations
	<b>Goals/Needs Addressed</b>	Strong and Healthy Neighborhoods
	<b>Funding</b>	CDBG: \$660,167
	<b>Description</b>	Create or improve safe, accessible, energy-efficient and well-maintained community and neighborhood facilities
	<b>Planned Activities</b>	GCC IronWorks Renovation Acquisition/Rehab Reserve Fund activities TBD
12	<b>Project Name</b>	Neighborhood Revitalization Plans & Projects
	<b>Objectives Supported</b>	Neighborhood Revitalization Plans and Projects
	<b>Goals/Needs Addressed</b>	Strong and Healthy Neighborhoods Effective Planning and Program Administration
	<b>Funding</b>	CDBG: \$267,942
	<b>Description</b>	Help residents within designated neighborhoods identify, plan for, and implement projects and activities that promise to enhance the quality of life for neighborhood residents
	<b>Planned Activities</b>	Concentration Neighborhood Planning Neighborhood Revitalization Projects (EEEEPY / DWSC / South Madison)

13	<b>Project Name</b>	Overall Program Administration
	<b>Objectives Supported</b>	Planning and Administration
	<b>Goals/Needs Addressed</b>	Effective Planning and Program Administration
	<b>Funding</b>	CDBG: \$476,138 HOME: \$293,707 City of Madison: \$400,000 EHH (ESG / HPP / HAP): \$8,061 HCRI: \$37,980
	<b>Description</b>	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
	<b>Planned Activities</b>	Bayview Renovation Resident Engagement Process Direct Administration and Support Services Futures Fund Reserve activities TBD
14	<b>Project Name</b>	ESG19 Madison <i>[also see Project #5]</i>
	<b>Objectives Supported</b>	Housing Assistance
	<b>Goals/Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	ESG: \$160,473 <i>(includes \$1,272 from ESG18)</i>
	<b>Description</b>	Improve housing stability for homeless
	<b>Planned Activities</b>	ESG19 Homelessness Prevention, including: - LAW Eviction Defense Project (Homeless) - TSA Diversion Case Manager  ESG19 Shelter, including: - TSA Emergency Family Shelter (Warming House) - TSA Single Women/Warming House Case Management  ESG19 Rapid Re-Housing, including: - TRC Rapid Rehousing  ESG19 HMIS Services  ESG19 Administration

**Table 9 – Project Summary**

## AP-50 Geographic Distribution

24 CFR 91.220(f)

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

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

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



The City also intends to prioritize and allocate a small portion of its funds annually (approximately 4% of CDBG entitlement funds) to activities that seek to improve neighborhoods, and provide a low/moderate area (LMA) benefit. These efforts will focus on the Neighborhood Revitalization Plans & Projects 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 Triangle-Monona Bay Neighborhood to develop the next neighborhood plan.

Target Area	Percentage of Funds
<i>(See this section's narrative.)</i>	

**Table 10 – Geographic Distribution**

***Rationale for the priorities for allocating investments geographically***

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

*(Refer to [www.cityofmadison.com/cdba/docs/targets\\_map.pdf](http://www.cityofmadison.com/cdba/docs/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/](http://www.cityofmadison.com/mayor/nrt/) for a map of NRT areas identified by the City as high priority, as well as related information.)*

<b>One-Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	745
Special-Needs	9
Total	754

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

<b>One-Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	594
Rehab of Existing Units	112
Acquisition of Existing Units	48
Total	754

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

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

The City's Community Development Authority (CDA) is in the process of developing a master plan for an area of the City known as the Triangle. It is the City's largest public housing site, containing over 300 units of public and Section 8 housing. Once the master plan is complete, the City will use it as a guide for the development of additional units. The City does not have specific plans to build additional units of public housing during 2019.

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

The CDA does not have a Resident Management Corporation. In 2019, a Community Development Division intern will provide support to CDA to research Public Housing Homeownership Programs in order to expand homeownership opportunities to residents. Once this report is finalized, CDD and CDA will work through implementation steps to engage with public housing residents interested in homeownership.

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

Not applicable.

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 transitional housing 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

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 recently approved a policy change 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 2019, City Community Development Division staff will be working 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:

- 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.

### *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 2019.

Proposed actions associated with the City's 2019 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 2019.

*Any other actions planned to:*

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

In 2019, 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 2019, this need will 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 2019 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 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 2019. Community gardens as neighborhood focal points in specific neighborhoods will also be an area of emphasis.

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

Among the strategies the City of Madison will use in 2019 to foster and maintain affordable housing are the following:

- For new multifamily developments pursuing Section 42 tax credits, aligning 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.
- Consider 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.
- Recruit financial institutions to create portfolio loan products that would allow for housing types that might not conform to current lending rules.

- ***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, employment resources and community gardens;
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 economic development and employment and training opportunities; and,
5. 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 nine designated 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 2019, 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.

## 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. <i>The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed</i>	\$ 1,206,425
2. <i>The amount of proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.</i>	\$ 0
3. <i>The amount of surplus funds from urban renewal settlements</i>	\$ 0
4. <i>The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan</i>	\$ 0
5. <i>The amount of income from float-funded activities</i>	\$ 0
<b>Total Program Income:</b>	<b>\$ 1,206,425</b>

## Other CDBG Requirements

1. <i>The amount of urgent need activities</i>	\$ 0
2. <i>The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income</i>	100 %
3. <i>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.</i>	2019

## HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

Not applicable.

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

The Community Development Division will use recapture provisions for all assistance provided as direct subsidies allowable in homebuyer activities per 92.254. Direct subsidies will be provided in the form of a 0% interest-bearing loan with shared appreciation due upon the sale, transfer of title, or the unit no longer remaining owner-occupied. CDD will recoup the amount invested in the property, plus shared appreciation. The recapture amount is based on the net proceeds available from the sale, rather than the entire amount of the HOME investment. "Net proceeds" is defined as the sales price, minus superior loan repayment and any

closing costs incurred by the borrower(s). CDD will record with the Register of Deeds a mortgage and a written agreement with the City of Madison to enforce the recapture provisions and period of affordability requirements of 92.254 on each property.

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

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

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

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

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

### **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 D**, *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 does operate a coordinated assessment system. Prior to 2018, the City of Madison was the sole funder for the CoC's Coordinated Entry system. In 2018, through the CoC NOFA process, funding was obtained to enhance the coordinated entry system. The City of Madison continues to provide operating support for the system, which is used as CoC match. Through the expansion of the system, a Coordinated Entry Manager was hired to oversee the process. The Manager will organize trainings and provide support and upkeep on the Housing Priority List the CoC uses to place individuals into permanent housing. The CoC continues to use the VI-SPDAT assessment tool to assist in quantifying vulnerability in order to ensure those most in need are prioritized for housing. Individuals can be screened at a variety of assessment hubs, which included all emergency shelters and day shelter, and through contact with any street outreach workers. These assessment hubs offer referral services, as well as screen the individuals or families to ensure proper placement on the housing priority list.

The Coordinated Entry System has also expanded to add coordination of eviction prevention services. A local non-profit provider was selected as the lead agency to provide referral services and financial assistance prioritizing households in need. Written Standards were approved by the Board of Directors to provide policy and procedures in prioritizing households in need for eviction prevention and housing services.

**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 2017, a homeless services funding process was held to determine use of 2018-2019 homeless service resources. The next Request for Proposals (RFP) process for homeless services will be conducted in 2020.

**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.***

The City contracts with nonprofit organizations providing housing and services to homeless and at-risk households using City, state and federal funds. The City receives federal ESG funds in its role as an entitlement grantee, and also receives ESG funds that pass through the State of Wisconsin, as the lead applicant for Madison/Dane County CoC agencies. A requirement for receiving City, state or federal dollars is that at least one homeless (or formerly homeless) person serve on either the agency's board of directors or other policymaking group. Each agency must identify for the City which board member fulfills that requirement. This information is recorded by the City, crediting the agency as having complied with the homeless participation requirement, while maintaining the confidentiality of the individual, if desired. The disclosure of homeless status is then in the hands of the individual board or committee member.

The City seeks feedback on policies and priorities for funding decisions from the Homeless Services Consortium (HSC), which serves as the area's CoC. Of the eleven voting members of the HSC Board of Directors, two elected members are homeless or formerly homeless, as mandated by the group's bylaws. All state and federal funding decisions are reviewed and approved by the HSC Board of Directors. 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.

**5. *Describe performance standards for evaluating ESG.***

The CoC created a list of criteria for 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 is on-course to meet its proposed goal number of households receiving assistance;
- 100% data quality in Wisconsin ServicePoint;
- Frequency with which the agency solicits client feedback on services provided;
- Agency submits requested reports to the City in a timely manner;
- Agency's program served:
  - (a) chronically homeless;
  - (b) persons with mental illness or AODA;
  - (c) veterans;
  - (d) victims of domestic abuse; and/or
  - (e) unaccompanied youth;
- 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.



# City of Madison

City of Madison  
Madison, WI 53703  
www.cityofmadison.com

## Master

**File Number: 55523**

**File ID:** 55523

**File Type:** Resolution

**Status:** Passed

**Version:** 1

**Reference:**

**Controlling Body:** FINANCE  
COMMITTEE

**File Created Date :** 04/23/2019

**File Name:** Approving submission of the City of Madison's required 2019 Action Plan to the U.S. Department of Housing and Urban Development (HUD).

**Final Action:** 05/21/2019

**Title:** Approving submission of the City of Madison's required 2019 Action Plan to the U.S. Department of Housing and Urban Development (HUD).

### Notes:

**Sponsors:** Samba Baldeh, Christian A. Albouras and Zachary Henak

**Effective Date:**

**Attachments:** DRAFT\_2019\_AAP.pdf

**Enactment Number:** RES-19-00420

**Author:** Linette Rhodes

**Hearing Date:**

**Entered by:** jstoiber@cityofmadison.com

**Published Date:**

### History of Legislative File

Ver- sion:	Acting Body:	Date:	Action:	Sent To:	Due Date:	Return Date:	Result:
1	Community Development Division	04/23/2019	Referred for Introduction				
1	COMMON COUNCIL	04/30/2019	Referred	FINANCE COMMITTEE		05/06/2019	
1	FINANCE COMMITTEE	04/30/2019	Referred	COMMUNITY DEVELOPMENT BLOCK GRANT COMMITTEE		05/02/2019	
1	COMMUNITY DEVELOPMENT BLOCK GRANT COMMITTEE	05/02/2019	Return to Lead with the Recommendation for Approval	FINANCE COMMITTEE			Pass
1	FINANCE COMMITTEE	05/06/2019	RECOMMEND TO COUNCIL TO ADOPT - REPORT OF OFFICER				Pass
1	COMMON COUNCIL	05/14/2019					
1	COMMON COUNCIL	05/21/2019	Adopt				Pass

## Text of Legislative File 55523

### Fiscal Note

The proposed resolution seeks Council approval for the City of Madison to submit its 2019 HUD Action Plan. The annual plan outlines the City's planned activities funded through federal formula grants for the 2019 calendar year. The specific funding sources outlined in the Action Plan total \$4,229,140 and include \$1,889,625 in Community Development Block Grant (CDBG) funds, \$1,378,974 in HOME Investment Partnerships Program (HOME) funds, \$159,201 in HEARTH/Emergency Solutions Grant (HESG) funds, \$19,761 in Future Madison private funds, \$528,379 in State ESG/HPP/HAP ("EHH") funds, and \$253,200 in Housing Cost Reduction Initiative (HCRI) funds. The Community Development Division's 2019 Adopted Operating Budget includes these funding sources in the Community Development Grants fund, primarily as intergovernmental revenue (\$4,566,003), and authorizes the expense of these funds in purchased services. No additional City appropriation is required.

### Title

Approving submission of the City of Madison's required 2019 Action Plan to the U.S. Department of Housing and Urban Development (HUD).

### Body

#### Background

The U.S. Department of Housing and Urban Development (HUD), as a condition of awarding federal funding to the City of Madison through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and HEARTH/Emergency Solutions Grant (HESG) Programs, requires the City to submit an annual Action Plan (AAP) describing how the City will use those funds. The AAP must also describe how supplemental funds from State and local sources will be used to further the same or similar goals and objectives. The goals and objectives upon which the AAP is developed are anchored in HUD priorities established for these program funds, including housing, economic development and neighborhood revitalization. Each expenditure of these funds is subject to approval by the City's CDBG Committee and the Common Council. The City of Madison's Community Development Division administers the funds.

#### Action

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) requires that each Entitlement community Grantee submit an Action Plan annually to receive federal funds; and,

WHEREAS, the City of Madison receives funding from HUD and is obligated to adhere to established rules and regulations regarding its use; and,

WHEREAS, the CDBG Committee held a public hearing on May 2, 2019, to seek public input and advice from community organizations, service providers and other stakeholders with respect to the use of federal funds; and,

WHEREAS, the Community Development Division developed the City's 2019 Action Plan consistent with the City's adopted 2015-2019 Consolidated Plan; and,

WHEREAS, the Community Development Division is charged with carrying out the goals and objectives in the Plan to include housing, economic development, and neighborhood revitalization activities;

NOW, THEREFORE, BE IT RESOLVED, that the Common Council hereby adopts and authorizes the submission to HUD of the 2019 Action Plan and authorizes the Mayor and City Clerk to sign any agreements necessary to accept the allocation of 2019 federal funds and enter into agreements needed to implement the Action Plan's articulated goals and objectives.



**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application**
- Changed / Corrected Application

**\* 2. Type of Application:**

- New**
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**STATE USE ONLY:**

**6. Date Received by State:**

**7. State Application Identifier:**

**APPLICANT INFORMATION:**

**\* 8a. Legal Name:** CITY OF MADISON

**\* 8b. Employer / Taxpayer Identification Number (EIN / TIN):**

39-6005507

**\* 8c. Organizational DUNS:**

07-614-7909

**8d. Address:**

\* Street 1: 215 MARTIN LUTHER KING JR BLVD STE 300

Street 2: PO BOX 2627

\* City: MADISON

County / Parish: DANE

\* State / Province: WI: WISCONSIN

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 53701-2627

**8e. Organizational Unit:**

Department Name:

DEPT OF PLANNING AND COMMUNITY & ECONOMIC DEVELOPMENT

Division Name:

COMMUNITY DEVELOPMENT DIVISION

**8f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

MS

\* First Name

LINETTE

Middle Name:

S

\* Last Name:

RHODES

Suffix:

Title:

INTERIM COMMUNITY DEVELOPMENT GRANTS SUPERVISOR

Organizational Affiliation:

\* Telephone Number:

(608) 261-9240

Fax Number:

(608) 261-9661

\* Email:

lrhodes@cityofmadison.com

**\* 9. Type of Applicant:**

C: CITY OR TOWNSHIP GOVERNMENT

**\* 10. Name of Federal Agency:**

U S DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14.218

**CFDA Title (Name of Program):**

COMMUNITY DEVELOPMENT BLOCK GRANT ENTITLEMENT PROGRAM

**\* 12. Funding Opportunity Number:**

N/A

**\* Title:**

ANNUAL FORMULA GRANT ALLOCATION

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

CITY OF MADISON

**\* 15. Descriptive Title of Applicant's Project:**

CONSOLIDATED CDBG, HOME & HESG ANNUAL ACTION PLAN

Add attachment(s), if applicable.

Attach supporting documents as specified in agency instructions.

APPLICATION FOR FEDERAL ASSISTANCE SF-424

16. Congressional Districts Of:

\* a. Applicant   
 \* b. Project

17. Proposed Project:

\* a. Start Date:   
 \* b. End Date:

Attach an additional list of Program/Project Congressional Districts, if needed.

\* 19. Is Application Subject to Review by State Under Executive Order 12372 Process?

- a. This application was made available to the State under E.O. 12372 Process for review on: \_\_\_\_\_  
 b. Program is subject to E.O. 12372, but has not been selected by the State for review.  
 c. Program is not covered by E.O. 12372.

18. Estimated Funding (\$):

* a. Federal	\$ 1,889,625.00
* b. Applicant	-
* c. State	-
* d. Local	8,018,187.00
* e. Other	1,972,320.00
* f. Program Income	1,206,425.00
* g. TOTAL	\$ 13,086,557.00

\* 20. Is the Applicant Delinquent On Any Federal Debt?

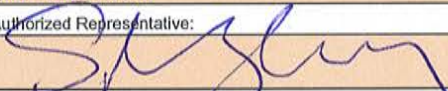
No  Yes (If "Yes", provide explanation in attachment.)

\* 21. By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

AUTHORIZED REPRESENTATIVE:

Prefix:  \* First Name:  Middle Name:   
 \* Last Name:  Suffix:   
 \* Title:   
 \* Telephone Number:  Fax Number:   
 \* Email:   
 \* Signature of Authorized Representative:  \* Date Signed:



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis- Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	MAYOR
APPLICANT ORGANIZATION	DATE
CITY OF MADISON	4/26/2019

**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application**
- Changed / Corrected Application

**\* 2. Type of Application:**

- New**
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**STATE USE ONLY:**

**6. Date Received by State:**

**7. State Application Identifier:**

**APPLICANT INFORMATION:**

**\* 8a. Legal Name:**

**\* 8b. Employer / Taxpayer Identification Number (EIN / TIN):**

**\* 8c. Organizational DUNS:**

**8d. Address:**

\* Street 1:

Street 2:

\* City:

County / Parish:

\* State / Province:

\* Country:

\* Zip / Postal Code:

**8e. Organizational Unit:**

Department Name:

Division Name:

**8f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name

Middle Name:

\* Last Name:

Suffix:

Title:

Organizational Affiliation:

\* Telephone Number:

Fax Number:

\* Email:

**\* 9. Type of Applicant:**

**\* 10. Name of Federal Agency:**

**11. Catalog of Federal Domestic Assistance Number:**

**CFDA Title (Name of Program):**

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add attachment(s), if applicable.

**\* 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.



**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

**16. Congressional Districts Of:**

\* a. Applicant   
 \* b. Project

**17. Proposed Project:**

\* a. Start Date:   
 \* b. End Date:

*Attach an additional list of Program/Project Congressional Districts, if needed.*

**18. Estimated Funding (\$):**

* a. Federal	\$	<input type="text" value="1,378,974.00"/>
* b. Applicant		<input type="text" value="-"/>
* c. State		<input type="text" value="253,200.00"/>
* d. Local		<input type="text" value="5,215,000.00"/>
* e. Other		<input type="text" value="4,407,877.00"/>
* f. Program Income		<input type="text" value="984,553.00"/>
* g. TOTAL	\$	<input type="text" value="12,239,604.00"/>

**\* 19. Is Application Subject to Review by State Under Executive Order 12372 Process?**

- a. This application was made available to the State under E.O. 12372 Process for review on: \_\_\_\_\_
- b. Program is subject to E.O. 12372, but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt?**

No  Yes (If "Yes", provide explanation in attachment.)

**\* 21. By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

**\*\* I AGREE**

**\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.**

**AUTHORIZED REPRESENTATIVE:**

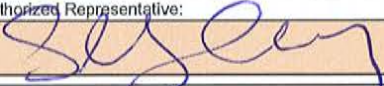
Prefix:  \* First Name:  Middle Name:

\* Last Name:  Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis- Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	MAYOR
APPLICANT ORGANIZATION	DATE
CITY OF MADISON	9/26/2019



**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed / Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

\_\_\_\_\_

**\* Other (Specify):** \_\_\_\_\_

**\* 3. Date Received:**

\_\_\_\_\_

**4. Applicant Identifier:**

\_\_\_\_\_

**5a. Federal Entity Identifier:**

\_\_\_\_\_

**5b. Federal Award Identifier:**

\_\_\_\_\_

**STATE USE ONLY:**

**6. Date Received by State:**

\_\_\_\_\_

**7. State Application Identifier:**

\_\_\_\_\_

**APPLICANT INFORMATION:**

**\* 8a. Legal Name:** CITY OF MADISON

**\* 8b. Employer / Taxpayer Identification Number (EIN / TIN):**

39-6005507

**\* 8c. Organizational DUNS:**

07-614-7909

**8d. Address:**

\* Street 1: 215 MARTIN LUTHER KING JR BLVD STE 300

Street 2: PO BOX 2627

\* City: MADISON

County / Parish: DANE

\* State / Province: WI: WISCONSIN

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 53701-2627

**8e. Organizational Unit:**

**Department Name:**

DEPT OF PLANNING AND COMMUNITY & ECONOMIC DEVELOPMENT

**Division Name:**

COMMUNITY DEVELOPMENT DIVISION

**8f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

MS

**\* First Name**

LINETTE

**Middle Name:**

S

**\* Last Name:**

RHODES

**Suffix:**

**Title:**

INTERIM COMMUNITY DEVELOPMENT GRANTS SUPERVISOR

**Organizational Affiliation:**

**\* Telephone Number:**

(608) 261-9240

**Fax Number:**

(608) 261-9661

**\* Email:**

lrhodes@cityofmadison.com

**\* 9. Type of Applicant:**

C: CITY OR TOWNSHIP GOVERNMENT

**\* 10. Name of Federal Agency:**

U S DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14.231

**CFDA Title (Name of Program):**

EMERGENCY SOLUTIONS GRANT PROGRAM

**\* 12. Funding Opportunity Number:**

N/A

**\* Title:**

ANNUAL FORMULA GRANT ALLOCATION

**13. Competition Identification Number:**

\_\_\_\_\_

**Title:**

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

CITY OF MADISON

**\* 15. Descriptive Title of Applicant's Project:**

CONSOLIDATED CDBG, HOME & HESG ANNUAL ACTION PLAN

Add attachment(s), if applicable.

Attach supporting documents as specified in agency instructions.

**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

**16. Congressional Districts Of:**

\* a. Applicant   
 \* b. Project

*Attach an additional list of Program/Project Congressional Districts, if needed.*

**17. Proposed Project:**

\* a. Start Date:   
 \* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	\$ 159,201.00
* b. Applicant	-
* c. State	528,379.00
* d. Local	1,365,943.00
* e. Other	1,272.00
* f. Program Income	-
<b>* g. TOTAL</b>	<b>\$ 2,054,795.00</b>

**\* 19. Is Application Subject to Review by State Under Executive Order 12372 Process?**

- a. This application was made available to the State under E.O. 12372 Process for review on: \_\_\_\_\_
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**\* 20. Is the Applicant Delinquent On Any Federal Debt?**

No  Yes (If "Yes", provide explanation in attachment.)

**\* 21. By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

**\*\* I AGREE**

**\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.**

**AUTHORIZED REPRESENTATIVE:**


Prefix:  \* First Name:  Middle Name:

\* Last Name:  Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	MAYOR
APPLICANT ORGANIZATION	DATE
CITY OF MADISON	9/26/2019

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

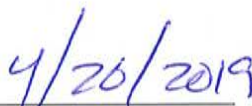
**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.



Signature of Authorized Official



Date

\_\_\_\_\_  
Mayor, City of Madison

Title



## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

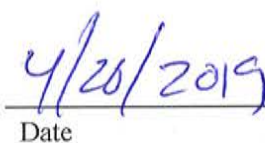
1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Mayor, City of Madison  
Title


**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

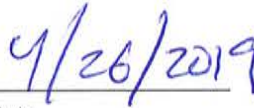
**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official



Date

Mayor, City of Madison

Title



## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

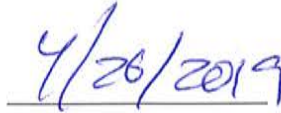
**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Mayor, City of Madison  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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# APPENDICES

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## **Summary of Citizen Participation Comments**

### *City of Madison, Wisconsin 2019 Action Plan*

Varieties of opportunities were offered for citizen participation regarding the City of Madison, Wisconsin 2019 Action Plan. All related 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.

A public hearing was held on 5/2/19, which was publicly noticed in a variety of forums, and comment was invited in the form of mail, email or in-person testimony. The draft Plan was posted on the City website and made available at public libraries well in advance of the public hearing. No comments were received.

The draft Plan was also the subject of discussion at a publicly noticed meeting of the CDBG Committee on 5/2/19. Open discussion by committee members and staff was undertaken during this meeting; however, no members of the public registered support or criticism, or offered comments.

The draft Plan was also listed on the agenda for publicly noticed meetings of the City Finance Committee on 5/13/19 and the Madison Common Council on 5/21/19. No members of the public registered in support or with criticism, or offered comments at either meeting. The Plan was approved by the Common Council at its meeting of 5/21/19.

# City of Madison

## Citizen Participation Plan

### A. PURPOSE

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

The City of Madison Community Development Division 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 on 3 alderpersons and 6 citizen appointments.

Since 1986, City of Madison CDBG unit has actively sought the involvement of Madison citizens in its community needs assessment and planning. Community Development staff analyzed information, trends, citizen survey and focus group responses, and 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 honoring this comprehensive approach, the CD Division also uses information gathered on a day to day basis through its operation of funded projects.

While the structure of the CD Division allows for ongoing participation of these individuals and groups, the Citizen Participation Plan applies to seven areas that the CDBG office oversees; (1) CDBG Committee Meetings and Regular Public Hearings; (2) Two-Year Funding Framework; (3) Development of the Five-Year Consolidated Plan; (4) One-Year Action Plan; (5) substantial amendments to the Consolidated or Action Plans; (6) Consolidated Annual Performance and Evaluation Report (CAPER); (7) amendments to the Citizen Participation Plan. HUD requires citizens have an opportunity to review on comment on the development and drafts of these documents to allocate funding to the jurisdiction. The document outlines how Madison residents may participate in these seven key areas.

## **B. CITIZEN PARTICIPATION PLAN**

### **CDBG Commission Meetings and Public Hearings**

The City has established a nine-member CDBG Committee formed by citizens and elected officials. The Committee discusses on-going issues of the program's operations, recommends funding for particular projects and oversees the development of all HUD projects. Additionally, the Committee provides an opportunity for continuous citizen and organization participation through regular meetings and public hearings.

The Committee has at least one meeting each month. All Committee meetings are publically noticed and open meetings, operated in a manner that permits citizen comments. These meetings follow the public meeting notice requirements outlined under the "Notifications" section of the Citizen Participation Plan. The Committee keeps written and public minutes of its meetings, and has organized certain key public documents, such as a publicity brochure, its annual objectives, and its Grantee Performance report, so that the information is available through staff in the Mayor's office, and in the Department of Planning and Development.

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 usually held in late spring and the second hearing in late summer. The hearings follow the requirements outlined in the "Notifications" section of this document.

CDBG staff themselves 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 (and some Committee members) are involved in such meetings with the Homeless Services Group (the Dane County Consortium), the Third Sector Group, Neighborhood Resource Teams, and such ad hoc groups as, the Housing Strategy Committee and Community Gardens Committee. These meetings serve as important sources of information about working with members of the target population.

### **Two-Year Funding Framework**

The CDBG Office sets its Program Funding Framework to cover each two year period. The goals and objectives of the two year period are derived from the CDBG Office's Five-Year Plan and support other Department and Citywide strategic goals, objectives and allocation processes. Setting the Funding Framework involves gathering input from Madison residents as well as the community agencies the CDBG Office regularly works with.

The CDBG Office develops a separate calendar and detailed explanation of the Summer process. To encourage active participation and understanding in the

Funding process, the City and other funding bodies hold one to two workshop sessions on how to apply for funding in May. The CDBG Office also outlines and distributes the opportunities for participation by citizens and applicant agencies through mailings, public meetings, CDBG Office web site, and alderpersons. Workshops and other meetings are held in accessible buildings located in neighborhoods with high concentrations of low and moderate income persons, and are advertised in the City's two major newspapers and many community organizations' newsletters. All meetings and hearings follow the "Notifications" section of this document.

### **Development of Five-Year Consolidated 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. The CDBG Office makes 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, the office encourages the participation of all residents, including minorities, the non-English speaking population, and persons with disabilities. This section outlines the steps for public participation in the Five-Year Consolidated Plan.

#### **1. 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 the CDBG Program and Commission. However, during the spring and summer, CDBG 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 in the Five-Year Plan.

#### **2. 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 and addressed in the Five-Year Plan.



**Public Hearings:** The CDBG Office holds at least two public hearings to provide an opportunity for input by Madison residents, especially residents who are low-income or in targeted neighborhoods, in 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 CDBG staff. The public hearing is advertised to citizens following the “Notifications” section of this document. The publication includes a summary of the plan that includes the contents and purpose of the consolidated plan.

**Comment Period:** Citizens are also 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 CDBG office and website and other public gathering spots. Notification of the draft plan and the designated locations will be published in the main newspaper as well as other publications that target minority, special needs or target neighborhood populations. Additionally, the CDBG office will provide a reasonable number of free copies of the plan to citizens and groups that request it.

### **3. Final Consolidated Plan**

The plan includes a summary of all written or 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 CDBG Committee, City Board of Estimates and City Common Council. The plan is submitted to HUD no later than 45 days before the start of the program year.

#### **One-Year Action Plan**

Each year an Action Plan and CAPER is submitted to HUD. The Action Plan outlines the funding allocations that will be used to achieve the objectives outlined in the Consolidated Plan. During the development of the Action Plan, 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 Action Plan is published for at least 15 days for written public comment. The final plan is approved by the CDBG Committee, City Board of Estimates and City Common Council before it is submitted to HUD.

### **Substantial Amendments**

The Citizen Participation Plan allows for “substantial amendments” to the One-Year Action Plan or Five-Year Consolidated Plans. Substantial amendments only apply to the changes in the use of CDBG funds, from one eligible activity to another. The CDBG office defines a substantial amendment as:

“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 or Action Plan, the CDBG 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 30 days and provide written comment to the CDBG 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 “Notifications” section of this document.

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

### **Consolidated Annual Performance and Evaluation Report (CAPER)**

The CDBG Office 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. This meeting is publicly noticed, held as part of a regularly scheduled Commission meeting, and encourages citizen comment about the program. The hearing follows 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 considers any comments received in writing or orally at public hearings and includes a summary of all these comments. The draft is available to citizens at various locations, including public libraries, specified neighborhood centers, the CDBG office and website and other public gathering spots.

The final CAPER includes a summary of and response to all citizen comment received orally or in writing. The CAPER is approved by the CDBG Committee, City Board of Estimates and City Common Council before it is submitted to HUD.

### **Substantial Amendments to Citizen Participation Plan**

If changes to the Citizen Participation Plan are necessary, the changes will be drafted by the CDBG staff and reviewed by the Committee. The 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. 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.

### **C. 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. Any public hearing before the CDBG Commission 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 “Notification” section below.

#### **Notifications**

Advance notice of all public meetings and hearings are 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 the Madison Code of 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 CDBG specific information on the CDBG 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 CDBG 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. Ads are published in local newspapers for general circulation and appear in English and/or Spanish or Hmong, if more appropriate. These ads appear for at least two weeks prior to any public hearing or comment period. The ads include a notice of the hearing, a summary of the relevant documents, process for public comment and a list of locations where relevant documents may be reviewed.

#### **Accommodation**

All public meetings and hearing 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 working days prior to a hearing or meeting. The CDBG office makes an effort to hold at least one meeting (either regular monthly meeting or public hearing) per year at a location where CDBG funds are directed or other low-income area.

### **Document Access**

Upon request, copies of all planning documents are available to the public. The Consolidated Plan, Action Plan, annual performance report, Citizen Participation Plan and other documents are posted on the CDBG website. The public has the opportunity to review these documents while in draft form to incorporate citizen comments and input into the final document. Draft documents will be available at several locations throughout the city. The list is published in the public hearing ad, but generally includes public libraries, neighborhood centers, the CDBG office, public housing authorities and other non-profit organizations offices. Citizens may contact the CDBG office to obtain a copy of the written documents. Upon request, the documents can 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 assistance awarded under grant programs.

### **Technical Assistance**

Technical assistance can 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 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**

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

Complaints should be addressed to:

### **City of Madison Community Development Division**

Room 225, Madison Municipal Building, 215 Martin Luther King, Jr. Blvd.

PO Box 2627 · Madison, Wisconsin 53701-2627

OR

[cdbg@cityofmadison.com](mailto:cdbg@cityofmadison.com)

## Summary of Actions

Impediments, Goals, and Actions	Responsible Party	Timeline
<b>1. Actions to alleviate Supply Impediments</b>		
<b>1.1 Build more rental units</b>		
1.1.1 Establish policies to maintain a 5% vacancy rate	Housing Strategy Com., Plan Commission, Council, staff	2014
1.1.2 Encourage flexible development (condo or rental)	Housing Strategy Com., Plan Commission, Council, staff	Ongoing
1.1.3 Create programs or incentives (Vancouver as model)	Housing Strategy Com., Plan Commission, Council, staff	2014
<b>1.2 Build more large assisted rental units</b>		
1.2.1 Offer incentives to encourage more large units	Housing Strategy Com., Plan Commission, Council, staff	Ongoing
<b>1.3 Increase supply of single occupancy units</b>		
1.3.1 Study this gap and identify strategies to increase supply	Housing Strategy Com., Plan Commission, Council, staff	2014
<b>2. Actions to alleviate Affordability Impediments</b>		
<b>2.1 Build more affordable units</b>		
2.1.1 Evaluate demand at various income levels and set targets and strategies for new unit creation	Housing Strategy Committee, Plan Commission, Council, Staff	2014
2.1.2 Encourage the inclusion of units affordable to low and very low income residents in development in all neighborhoods	Housing Strategy Committee, Plan Commission, Council, Staff	Ongoing
2.1.3 Provide incentives for the rehabilitation of existing affordable market rate units to mitigate/prevent their replacement by non-affordable units	Housing Strategy Committee, Plan Commission, Council, Staff	Ongoing
2.1.4 Encourage more non-traditional housing types (co-housing, co-ops, etc.)	Housing Strategy Committee, Plan Commission, Council, Staff	Ongoing
<b>3. Actions to alleviate Financial Impediments</b>		
<b>3.1 More loans to minorities</b>		
3.1.1 More credit and homebuying education	Staff, Homebuyers Roundtable	Ongoing
3.1.2 More lender education to avoid predatory lending	Staff, Homebuyers Roundtable	Ongoing
3.1.3 More post-purchase education to improve ownership experience	Staff, Homebuyers Roundtable	Ongoing
3.1.4 Encourage local lenders to Affirmatively Further Fair Housing, including outreach to underserved communities	Staff, Homebuyers Roundtable	Ongoing
3.1.5 Further target City home loan programs toward racial and ethnic households and neighborhoods	Staff	Ongoing
3.1.6 Make City loan program information easy to find and understand on the City website	Staff	2014

Impediments, Goals, and Actions	Responsible Party	Timeline
<b>4. Actions to alleviate Spatial Impediments</b>		
<b>4.1 Direct assisted/subsidizing housing toward all neighborhoods</b>		
4.1.1 Resist neighborhood opposition to affordable housing	Plan Commission, Council	Ongoing
4.1.2 Collaborate with CDA and WHEDA to prioritize certain neighborhoods for new units	Staff, CDA, Plan Commission, Council, Housing Strategy Com.	Ongoing
4.1.3 Develop a Comprehensive Housing Strategy	Housing Strategy Committee, Staff, Council	2014
4.1.4 Adjust development review fees to tie the fee to the projected unit value or rental cost	Staff, Council	2014
<b>4.2 Reduce racial segregation</b>		
4.2.1 Acknowledge and craft policy to reduce racial segregation in the comprehensive plan, neighborhood plans, Comprehensive Housing Strategy and the 5 year Consolidated Plan for HUD funding.	Staff, Plan Commission, Council, Housing Strategy Com.	Ongoing
<b>4.3 Improve job access via Metro Transit</b>		
4.3.1 Evaluate the routing system and schedule with a focus on the needs of low-income residents and neighborhoods	Staff, Committees, Council, Transit and Parking Commission	2014- 2020
4.3.2 Develop more housing along transit corridors	Plan Commission, Council, Transit and Parking Commission	Ongoing
<b>4.4 Improve access to grocery stores</b>		
4.4.1 Encourage development and services that offer daily grocery access in all neighborhoods	Staff, Plan Commission, Council	Ongoing
<b>5. Actions to alleviate Administrative Impediments</b>		
<b>5.1 Increase use of fair housing compliant procedures</b>		
5.1.1 Simplify materials and emphasize ease and quick resolutions	Staff	2014
5.1.2 Optimize the City website to make it easy to find fair housing info	Staff	2014
5.1.3 Coordinated training to identify and direct housing-related complaints	Staff	2014
5.1.4 Add "Housing Discrimination" to the Report a Problem system	Staff, IT	2014
5.1.5 Contract with a Qualified Fair Housing Enforcement Organization to provide investigative services	Staff	Ongoing
5.1.6 Revise fair housing ordinances to be consistent with state law	Staff, Council	2014

Impediments, Goals, and Actions	Responsible Party	Timeline
<b>5.2 Establish implementation strategies and responsibility</b>		
5.2.1 Establish clear implementation roles and responsibilities within DPCED	DPCED Director, Staff	2014
5.2.2 Collaboration and Coordination among DPCED, CDA, DCR	Directors and Staff of each	2014
5.2.3 Streamline and combine funding programs	Mayor, Council, Staff	2014-2016
<b>5.3 Prevent segregation of disabled residents in group homes</b>		
5.3.1 Consider revisions to the number of residents allowed in Community Living Arrangements	Staff, Plan Commission, Council, Commission on People with Disabilities	2014
<b>5.4 Improve protected class representation on Boards and Commissions</b>		
5.4.1 Actively recruit women, African Americans, Hispanics, and disabled persons to City boards and commissions	Council, staff	Ongoing

*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.* *[section AP-10]*

Although this table lists those agencies, groups, organizations and others who were consulted as part of the City's 2015-2019 Consolidated Plan process, their feedback/input directly informed decisions made during development of the 2019 Action Plan.

1	<b>Agency/Group/Organization</b>	Public Health Madison & Dane County
	<b>Agency/Group/Organization Type</b>	Health Agency Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/18/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
2	<b>Agency/Group/Organization</b>	Centro Hispano
	<b>Agency/Group/Organization Type</b>	Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 1/15/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
3	<b>Agency/Group/Organization</b>	City of Madison Department of Civil Rights
	<b>Agency/Group/Organization Type</b>	Services-Employment Service-Fair Housing Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
4	<b>Agency/Group/Organization</b>	Madison Gas & Electric
	<b>Agency/Group/Organization Type</b>	Civic Leaders Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 1/15/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.



5	<b>Agency/Group/Organization</b>	YWCA of Madison Inc
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	Madison Area Community Land Trust
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
7	<b>Agency/Group/Organization</b>	Independent Living Inc
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
8	<b>Agency/Group/Organization</b>	Movin' Out Inc
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
9	<b>Agency/Group/Organization</b>	Wisconsin Partnership for Housing Development
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

10	<b>Agency/Group/Organization</b>	Habitat for Humanity of Dane County Inc
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
11	<b>Agency/Group/Organization</b>	Dane County Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
12	<b>Agency/Group/Organization</b>	Operation Fresh Start Inc
	<b>Agency/Group/Organization Type</b>	Housing Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
13	<b>Agency/Group/Organization</b>	Housing Initiatives, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/12/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
14	<b>Agency/Group/Organization</b>	Madison Development Corporation
	<b>Agency/Group/Organization Type</b>	Housing Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.

15	<b>Agency/Group/Organization</b>	Common Wealth Development Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
16	<b>Agency/Group/Organization</b>	The Road Home Dane County Inc
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
17	<b>Agency/Group/Organization</b>	Bayview Foundation
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
18	<b>Agency/Group/Organization</b>	Wisconsin Youth and Family Center
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
19	<b>Agency/Group/Organization</b>	Kennedy Heights Neighborhood Center
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

20	<b>Agency/Group/Organization</b>	East Madison Community Center Inc
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
21	<b>Agency/Group/Organization</b>	City of Madison Community Services
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Victims of Domestic Violence Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
22	<b>Agency/Group/Organization</b>	Goodman Community Center
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
23	<b>Agency/Group/Organization</b>	Lussier Community Education Center
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
24	<b>Agency/Group/Organization</b>	City of Madison Police Department
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/18/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

25	<b>Agency/Group/Organization</b>	Madison Senior Center
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/18/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
26	<b>Agency/Group/Organization</b>	City of Madison Mayor's Office
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/18/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
27	<b>Agency/Group/Organization</b>	City of Madison - Public Works Division - Metro Transit Unit
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/18/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
28	<b>Agency/Group/Organization</b>	Community Gardens Committee
	<b>Agency/Group/Organization Type</b>	Other government - Local Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/03/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
29	<b>Agency/Group/Organization</b>	Community Action Coalition of So Central WI
	<b>Agency/Group/Organization Type</b>	Services-homeless Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.



30	<b>Agency/Group/Organization</b>	Cuna Mutual Foundation
	<b>Agency/Group/Organization Type</b>	Business Leaders Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 01/16/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
31	<b>Agency/Group/Organization</b>	Wisconsin Department of Administration- Division of Housing
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 01/16/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
32	<b>Agency/Group/Organization</b>	Dane County Executive's Office
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
33	<b>Agency/Group/Organization</b>	Madison Community Foundation
	<b>Agency/Group/Organization Type</b>	Civic Leaders Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 01/16/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
34	<b>Agency/Group/Organization</b>	Forward Community Investments
	<b>Agency/Group/Organization Type</b>	Civic Leaders Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 01/16/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

35	<b>Agency/Group/Organization</b>	City of Madison Department of Planning & Community & Economic Development
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 12/18/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
36	<b>Agency/Group/Organization</b>	Wisconsin Women's Business Initiative
	<b>Agency/Group/Organization Type</b>	Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/21/13 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.
37	<b>Agency/Group/Organization</b>	City of Madison Community Development Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
38	<b>Agency/Group/Organization</b>	Capital Area Regional Planning Commission
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 01/16/14 to collect comments on needs/trends/priorities for City of Madison. Will forward consolidated plan to agency to continue discussion for improved performance.

39	<b>Agency/Group/Organization</b>	Madison/Dane County Continuum of Care
	<b>Agency/Group/Organization Type</b>	Housing PHA Services-homeless Other government - Local Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy Non-housing community development strategy
	<b>How was the Agency, Group or Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Met with the agency 11/05/13 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**



# DANE COUNTY WRITTEN STANDARDS 2018





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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).

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 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 written standards will:

- Establish community-wide expectations on the operations of projects within the community;
- Ensure the system that 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 were 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 (Appendix TBD) 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.

Outside of the standard monitoring process, if the CoC Coordinator or the Board receives concerns regarding written standards compliance, the Board will investigate the concern, provide technical assistance, and require corrective action as necessary.

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.

Homeless housing and service providers must coordinate and integrate activities targeted to homeless people in the Dane County Continuum of Care system. Programs designed to serve homeless and at-risk households must provide a strategic and community-wide system to prevent and end homelessness.

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 individual or family experiencing homelessness.
2. The program provides assistance in accessing suitable housing.
3. The program is aligned with the community goals for the Built for Zero initiative, the Homeless Services Consortium Plan to Prevent and End Homelessness, and current Department of Housing and Urban Development priorities, including priorities for ending homelessness among specified sub-populations.
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. The full Service Prioritization Decision Assistance Tool (SPDAT) is to be recommended as an assessment tool for housing case management and housing programs. The full SPDAT should only be administered by staff trained to do so. SPDAT data should be entered into the Homeless Management Information System (HMIS).
6. 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.
7. 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.
8. 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.
9. Each program will make language translation service available for clients when needed by utilizing available services, such as a language line.
10. 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

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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

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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

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- 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

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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

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- Tenants are not required to have income for program eligibility.
- 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.

- 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.
- 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<sup>1</sup>

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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.*

- Does the project provide and explain the written eligibility criteria, which are in line with the Housing First philosophy, to participants?
- 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?
- Does the project accept participants who are diagnosed with or show symptoms of a mental illness?
- 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?

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<sup>1</sup> Program Evaluation taken from:

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

- Upon entry to the project, the project agrees to allow participants to remain in the project even if they require an absence of 90 days or less due to the reasons outlined below, unless otherwise prohibited by law or funder policy:
  - a. Substance use treatment intervention
  - b. Mental health treatment intervention
  - c. Hospitalization and short-term rehabilitation
  - d. Incarceration
  - e. Or other reason approved by the program supervisor

## 5. TERMINATION AND GRIEVANCE PROCEDURES

### MINIMUM STANDARDS

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1. Programs should terminate assistance only in the most severe cases, utilizing the housing first philosophy. (See Housing First section.)
  - Prior to initiating program termination, PSH program staff will complete a Transfer Request Form (Appendix L) and submit to the Coordinated Entry Manager for discussion at the next meeting. At the placement meeting, PSH program staff will discuss the situation and housing options, including keeping the participant in their current program and possibly transferring the participant to another program.
  - Discussion of housing options will be participant-centered.
  - Transfers may be made from PSH to PSH program if the participant has chronic homeless documentation in place prior to program entry.
  - Transfers may be made from RRH to PSH if the participant needs more intensive support services. There must be documentation of chronic homeless status prior to RRH program entry. Transfers from RRH to PSH should not be made only for affordability reasons.
  - Transfers will be granted based on consensus of those present at the Housing Placement Meeting.
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. If a program participant is terminated from a program in which the agency owns the unit, the program will retain the participant's property for a minimum of 30 days before discarding.
7. Nothing in this section shall prevent an agency from reinstating services pursuant to applicable law.

## 6. 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

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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

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- 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

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- 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 K) 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.

#### MINIMUM STANDARDS FOR FINANCIAL ASSISTANCE

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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 **6 months**, rental application fees, security deposits equal to no more than 2 months rent, last month's rent, utility deposits, utility payments up to **6 months**, and moving costs (or otherwise directed by the funder).
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. If the PSH program is leasing or operation, the household is not eligible for financial prevention assistance.
4. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing for at least 30 days. Prevention funds may be provided for 6 months of rental arrears not to exceed two months of Fair Market Rent for the unit type.

- a. All clients are assessed to determine initial need and create a budget to outline planned need for assistance, including establishing a plan for housing stability for the next 30 days.
  - b. Agencies cannot set organizational maximums or minimums.
  - c. The HSC expects that agencies will use progressive engagement and households receive the minimum amount of assistance necessary to stabilize in housing.
5. If providing short-term rental assistance (more than a one time payment of rental arrears), eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
  - a. The program participant does not have an annual income that exceeds 30% of county median income.
  - b. The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
  - c. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
6. Financial assistance will be distributed in a way to ensure that programs have funds available throughout the grant period.
7. Participants will work with their case manager to develop their individual housing plan based on participant goals and shared goals for achieving housing stability. Case managers will use the housing plan to determine the participant contribution based on monthly income. Financial assistance is available for households with zero income.

#### MINIMUM STANDARDS FOR HOUSING RELOCATION AND STABILIZATION SERVICES

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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 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.
3. 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.
4. 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.
5. 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 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.

### ELIGIBILITY CRITERIA

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- Participants must meet category 1 – Literally Homeless as outlined by the HUD definition of homelessness.
- Priority will be given those who are not already engaged with the system

### MINIMUM STANDARDS

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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 the participants are eligible
2. Participant engagement – outreach workers will locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing 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, clothes, or toiletries.
5. Programs will provide assistance with navigating the homeless service system, including linking the participant to coordinated entry, conducting the VI-SPDAT assessment and referring the participant to the permanent housing priority list.
6. Outreach staff will remain connected to participants until they are linked to other supportive services. These may include shelter case management, CCS services or services offered through a housing program.
7. Programs will work with coordinated entry system and make appropriate referrals to permanent housing placement. Participate in outreach and placement meetings.
8. If a worker does not have contact with a participant for 90 days, the participant must be exited from the program in HMIS.

### MINIMUM PERFORMANCE BENCHMARKS

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1. Less than 5% of participants who have a successful exit (no longer sleeping outside) will return to shelter within 2 years OR the number of participants returning to shelter within 2 years decreases by 20% from the previous year.
2. 80% of participants will have a successful exit from the outreach program.
3. At least 46% of participant situations will meet HUD's definition of chronic homelessness.

### 3. DIVERSION

Diversion<sup>2</sup> 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 connects to people as they are requesting shelter. Diversion is not about keeping people out of the shelter system. It is about creative conversations to help people remain in their current housing situation. It should always be safe and appropriate for 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

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1. A standard assessment tool should be used to screen for diversion. See Appendix G for Diversion Assessment Tool.

#### MINIMUM STANDARDS

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1. Immediate Connection to Case Management: When a household is deemed eligible for diversion services, they must be connected to a case manager immediately to start housing planning, both for immediate and long-term 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 should be screened for diversion eligibility using an assessment tool.
4. System Entry Points: Assessment for eligibility should take place at the initial access point to the homeless assistance system.
5. Cooperation from Other Providers: Instead of automatically admitting people into shelter, providers should assess or refer them to be assessed for diversion. This ensures that all families have a chance at being diverted.
6. Cooperation from Service Providers: Mainstream service providers may help stabilize families once they have been diverted or have found a new unit. In addition, they can refer families who may be eligible for diversion services.
7. Flexible Funding: Funds should ensure households get into or maintain housing, allow them to stay longer in a doubled up situation, unify them with family members or get them into new housing.
8. Participant safety must be considered first. Participants decide what is safe and appropriate for themselves.
9. If a participant requests funds to get to another community, service providers must confirm they have housing in that community.
10. All participants who enter into a diversion program must be entered into HMIS.

#### MINIMUM PERFORMANCE BENCHMARKS

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<sup>2</sup> Diversion section taken from: National Alliance to End Homelessness, “Closing the Front Door: Creating a Successful Diversion Program for Homeless Families”



1. In 2018, divert 10% of households that contact any organization that helps people experiencing homelessness into safe and legal living conditions. (2019-15%, 2020-25%, 2021-35%)
2. In 2019, no more than 15% of households served with diversion resources will experience homelessness again over the course of two years. (2020-no more than 7%)

#### 4. EMERGENCY SHELTER

The purpose of emergency shelter is to provide 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.

#### ELIGIBILITY CRITERIA

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- Participants must meet the HUD definition of homelessness.

#### MINIMUM STANDARDS

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1. Shelter programs must create policies and procedures that provide a safe environment for shelter guests and staff; policies and procedures may vary depending on the shelter population being served. These policies and procedures must be explained to applicants prior to moving into the shelter. In addition, they must be posted in the shelter and on the agency's website.
2. Supportive services are available to assist persons in obtaining housing either on-site or through a day-time resource center. All shelter residents are notified of the availability of support services and how to access the services.
3. Shelter is available every day of the year. In the instances where it is necessary to temporarily close a shelter 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.
4. Shelter guests will be treated by staff and volunteers with respect and dignity and will receive a welcoming, safe and non-intimidating environment.
5. 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 themselves. Transgender and transsexual guests will be offered the same services and resources as all other guests as long as resident safety can be maintained. While shelter staff will take reasonable steps to accommodate specific needs, it may not be possible to segregate the individual 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 transgendered/transsexual.
6. All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marital status identifying as a family at a family shelter must be served as a family. Families at family shelters must not be separated when entering shelter. There can be no inquiry, documentation requirement or "proof" related to family status, gender identification and/ or sexual orientation. The prohibition on inquiries or documentation does not prohibit inquiries related to an individual's sex for the limited purpose of determining placement in temporary, emergency shelters that are limited to one sex because they have shared bedrooms

or bathrooms, or for determining the number of bedrooms to which a household may be entitled. The age and/or gender of a child under 18 must not be used as a basis for denying any family's admission to a program that uses ESG or THP funding or services if those programs serve families with children under age 18.<sup>3</sup>

7. There is no charge to a shelter guest for emergency shelter.
8. Documentation (including Photo ID, birth certificate, etc.) is not a barrier to shelter. Identification may be requested when safety is a factor.
9. 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. Banning a shelter guest is allowed only when all other options have been explored and a ban 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.

## ACCESS TO SHELTER

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- 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.

## PRIORITIZATION FOR FAMILY SHELTER

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- Emergency Family Shelter (EFS): provides shelter for 18 people on a nightly basis, with additional overflow shelter between April - October. Priority is given to families with newborns (3 months and younger) and then to families who were denied the night before. As many families as possible are accommodated, based on space available. Other factors that are accounted for are VI-F-SPDAT score and where the family sleeps when not accepted in to EFS.
- Family Shelter: Families are prioritized for Family shelter based on VI-F-SPDAT score, family size and the number of beds available, length of time on the priority list with weekly check in, and also by eligibility/compatibility per shelter.

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## SHELTER FOR FAMILIES WITH CHILDREN

The Salvation Army is the point of entry for shelter for homeless families. Shelter is provided on-site at The Salvation Army building on East Washington Avenue, at the YWCA on East Mifflin Street, at The Road Home, which uses rotating sites, and at local motels. If these options are full, homeless families

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<sup>3</sup> 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)

will be offered a spot at the Emergency Shelter overflow program which is a night-time only shelter located at The Salvation Army shelter building as space allows. All families access the shelter system via coordinated entry to determine eligibility and availability.

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#### SHELTER FOR SINGLE MEN

Porchlight is the point of entry for nighttime shelter for homeless single men. The main facility of the Drop-In-Shelter (DIS) is located at Grace Church on West Washington Avenue. Other downtown churches serve as a year-round overflow and a seasonal over-flow space.

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#### SHELTER FOR SINGLE WOMEN

The Salvation Army is the point of entry for shelter for homeless single women. The Salvation Army operates a first come, first serve, nighttime-only shelter in the same building as the family shelter on East Washington Avenue.

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#### SHELTER FOR UNACCOMPANIED YOUTH

Briarpatch Youth Services is the point of entry for homeless youth, and has an 8-bed shelter for youth ages 13-17.

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#### SHELTER FOR PERSONS WITH IMMEDIATE SAFETY NEEDS

Individuals and families with children who have an immediate need for shelter to escape domestic violence are provided housing and services through Domestic Abuse Intervention Services (DAIS). When shelter beds are not available, participants may be assisted through temporary placement in local motels or referred to other community resources. Eligible residents may be single men, single women, or adults with children who are experiencing intimate partner violence.

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#### MEDICAL SHELTER VOUCHERS

Individuals and families are eligible for emergency medical shelter if they are homeless and their present medical condition compromises their ability to safely reside in a traditional shelter setting. Participants must receive a referral by their healthcare provider. Placement in a local motel is subject to availability of funds and program eligibility, including but not limited to, fragility of condition. Medical shelter is intended for a short period of time and is not intended for people with chronic conditions. At this time, medical shelter vouchers are accessed directly through the Salvation Army.

### **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.

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#### ELIGIBILITY CRITERIA

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- Participants must meet categories 1 - Literally Homeless, 2 - At Imminent Risk, or 4 - Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- By 2017, 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
  - d. unaccompanied and pregnant or parenting youth (age 16-24) who are unable to live independently (i.e. unemancipated minors) 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
  - g. large families (6 or more people)

#### MINIMUM STANDARDS

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1. Maximum length of stay cannot exceed 24 months.
2. Assistance in transitioning to permanent housing must be provided. A VI-SPDAT must be completed within 30 days of program entry, and the household name referred to the appropriate housing priority list, if not done already. A participant has the right to refuse completing the VI-SPDAT assessment.
3. Intensive support services must be provided through the duration of stay in transitional housing.
4. 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.
5. Case management staff must have skills and experience to meet the unique needs of the population served.

#### MINIMUM PERFORMANCE BENCHMARKS FOR TH PROJECTS

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- 80% or more of all participants will exit to a permanent housing situation
- 63% or more of all participants will have mainstream (non-cash) benefits at exit from program
- 54% or more of adult participants will increase income from all sources

## 6. PERMANENT SUPPORTIVE HOUSING

Permanent supportive housing (PSH) is safe, affordable housing, the purpose of which is to provide housing without a designated length of stay.

## ELIGIBILITY CRITERIA

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

## PARTICIPANT PRIORITIZATION REQUIREMENTS<sup>4</sup>

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- Participants will be prioritized for eligibility based on their chronic homeless status, length of time homeless, and VI-SPDAT or VI-F-SPDAT score.

**FIRST PRIORITY** - Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.

A chronically homeless individual or head of household 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<sup>5</sup>.

**SECOND PRIORITY** - Chronically Homeless Individuals and Families with the Longest History of Homelessness.

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<sup>4</sup> The order of priority follows 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>.

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

A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which 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 not identified the chronically homeless individual or the 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.

### THIRD PRIORITY - Chronically Homeless Individuals and Families with the Most Severe Service Needs.

A chronically homeless individual or head of household 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 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 chronically homeless individual or the 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.

### FOURTH PRIORITY - All Other Chronically Homeless Individuals and Families.

A chronically homeless individual or head of household 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 four separate occasions in the last 3 years, where the cumulative total length the four 8 occasions is less than 12 months; and
- ii. The CoC or CoC program recipient has not identified the chronically homeless individual or the 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.

## COMMUNITY-WIDE PRIORITIZATION REPORT

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Following the above prioritization requirements, the community-wide prioritization report will rank potential participants by chronic homeless status and total points. The number of points are determined



by using the following calculation: (Number of months of homelessness/12) + VI-SPDAT score = total points.

#### RECORD KEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS<sup>6</sup>

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

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

#### A. EVIDENCE OF HOMELESS STATUS

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

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

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<sup>6</sup> 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>.

## 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

## MINIMUM STANDARDS

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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. PSH project will use housing first approaches.

## ACCESS TO PSH PROJECTS

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- All referrals for PSH projects will come through the coordinated entry system and the CoC-wide PSH priority lists for families and individuals.
- Exceptions to the priority list will be made in rare circumstances for persons who are extremely vulnerable. This includes participants who are unable to complete the VI-SDPAT due to a mental health barrier, a severe cognitive disabilities, or traumatic brain injury. A majority of those present at the housing placement meeting must agree to the exception. The following will be taken into consideration:

- The number of ambulance calls within the last month
  - The participant’s score for the medical questions on the VI-SDPAT/VI-F-SPDAT
  - Written documentation from a medical health professional
- Or
- Consensus among outreach workers
- Following the Housing First model, HSC programs will collaborate to ensure that program participants facing possible eviction from their unit, and termination from a program, remain in permanent housing. Exceptions to the priority list may be made to transfer current program participants, who were chronically homeless at the time of program entry, from RRH to PSH programs, or from PSH to PSH programs. Program staff will bring the participant case to the placement meeting prior to initiating the eviction process for trouble-shooting and discussion of housing options, including keeping the participant in their current program and possibly transferring the participant to another program. Discussion of housing options will be participant-centered. If a program transfers a participant out of their program, the program will be required to take a new participant off the community-wide priority list.

#### MINIMUM PERFORMANCE BENCHMARKS FOR PSH PROJECTS

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- 80% or more of participants remain stable in PSH for at least one year or exit to a different permanent housing situation
- 20% or more of adult participants will have income from sources other than employment
- 54% or more of adult participants will increase income for sources other than employment
- 75% or more of all participants will have mainstream benefits at exit from the project
- 20% or more of adult participants will have employment income

### 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 (no more than 24 months of rental assistance, in addition to up to 6 months of continued case management), using a progressive engagement approach and tailoring services to the needs of the household in order to assist the household to maintain permanent housing. (24 CFR 578.37 and *Core Components of Rapid Re-Housing*, National Alliance to End Homelessness) According to the National Alliance to End Homelessness, progressive engagement is “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

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- 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.
- The participant’s household annual income must be at or below 30% CMI.
- The participant must be assessed using the VI-SPDAT or VI-F-SPDAT. To qualify for RRH, a participant must have a VI-SPDAT score in the range 4-7 or a family must have a score within the range 4-8. A copy of the assessment shall be retained in the participant’s file.
- Participants must lack sufficient resources and support networks necessary to retain housing without rapid rehousing assistance (24 CFR 578.37(E)).
- Participants will be prioritized based on VI-SPDAT or VI-F-SPDAT score and length of time homeless. Youth ages 18-21 will be prioritized.

## COMMUNITY-WIDE PRIORITIZATION REPORT

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The community-wide prioritization report will rank potential participants by homeless status and total points. The number of points are determined by using the following calculation: (Number of months of homelessness/12) + VI-SPDAT score = total points.

## MINIMUM STANDARDS

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1. The maximum length of program participation is 24 months.
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 RRH project.
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 programs may provide move-in costs.
5. RRH project will use Housing First approaches, following the Minimum Standards listed in the Housing First section of the Written Standards.
6. Financial assistance and case management should be based on a household’s individual needs using progressive engagement. Assistance should be offered using a light touch; start with a small amount of assistance and increase it if needed.

7. RRH programs will connect households with community resources and mainstream benefits to allow for individual resources to be used for housing costs.

#### ACCESS TO RAPID RE-HOUSING

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- All referrals for RRH projects will come through the coordinated entry system and the HSC community RRH priority lists for families and individuals.

#### MINIMUM PERFORMANCE BENCHMARKS FOR RRH PROJECTS

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- Average length of shelter stay is less than 45 days.
- Average time from program entry to housing placement is 60 days.
- Referral to RRH Priority List within 7 days of emergency shelter entry or assessment for families and individuals living on the streets or in a place not meant for human habitation.
- 80% of participants will remain in permanent housing -at the end of the operating year or exiting to permanent housing during the operating year
- 80% of adult participants will maintain or increase their total income -at the end of the operating year or program exit.

### 8. 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 publicly post the Emergency Transfer Plan on its website and in a conspicuous location on its premises.

#### ELIGIBILITY CRITERIA

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- A victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if:
  - 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
    - 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) that 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, 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.

- 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

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1. Upon request for an emergency transfer, the housing provider must establish an individualized plan within 24 hours to the tenant and provide a copy of the plan to the tenant in writing.
2. 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.
3. If a participant must move outside of the current project to locate a safe unit, the program staff must communicate with other projects within the CoC's Coordinated Entry System 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.
4. Program participants requesting an emergency transfer will be prioritized above any other households for open units.
5. The program participant will make a decision on whether or not a unit qualifies as a safe unit.
6. 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.
7. Agencies participating in Coordinated Entry must accept emergency transfers as they have available units that are deemed safe.
8. Program staff will work together to ensure an immediate transfer to a new safe unit. If needed, the participant may seek shelter while a permanent safe unit is being secured.
9. 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 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.

10. 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 providers are NOT required to request documentation.** 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:

- Certification Form (see Appendix)
- A document:
  - 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;
  - Signed by the applicant or tenant; and
  - 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
- A record of a Federal, State, tribal or territorial or local law enforcement agency, court or administrative agency; or
- 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. **Housing providers are NOT required to obtain the above documentation.** 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.

11. 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.

## APPENDIX A: DEFINITION OF HOMELESSNESS

### 24 CFR §583.5 HUD HOMELESS DEFINITION

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- (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.

## APPENDIX B: DEFINITION OF CHRONICALLY HOMELESS

### 24 CFR §578.3 HUD CHRONICALLY HOMELESS DEFINITION

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- (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.

## APPENDIX C: DEFINITION OF AT RISK OF HOMELESSNESS

### 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 D: COORDINATED ENTRY POLICIES AND PROCEDURES

“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 children and their families as well as 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.” (Opening Doors: Federal Strategic Plan to Prevent and End Homelessness, p. 57)

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 ETH Grant funding must abide by these policies and procedures. Programs funded through other sources are highly encouraged to participate in CE and follow these policies and procedures.

Coordinated Entry responsibilities are completed at assessment hubs which are both permanent and mobile locations. Coordinated Entry staff refers to staff paid through the CoC grant for Coordinated Entry and are located at hubs. Other staff may be certified to complete coordinated entry duties, but are not located at a hub.

### **Access**

#### **Full Coverage**

The Coordinated Entry system is accessible throughout Dane County. The Homeless Services Consortium website has up to date information regarding access to Coordinated Entry. There are phone numbers that people can use to connect to the system. Phone numbers can be accessed through the website ([www.danecountyhomeless.org](http://www.danecountyhomeless.org)). Callers will be assessed for immediate needs over the phone and will not be required to present in the provider’s office. Assessment Hubs are located at The Salvation Army, Porchlight Men’s Shelter and The Beacon Day Resource Center. 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 (Briarpatch, DAIS, Catholic Multicultural Center, etc). Additionally, there are monthly Mobile Assessment Hubs provided in areas surrounding the City of Madison. There will be 4 Assessment Hubs located in the north, south, east and west quadrants of Dane County that will be visited as necessary to do VI-SPDATs and provide services.

## Emergency Services

Households are able to access low barrier emergency shelter outside of the CE intake and assessment hours at The Beacon. Households who present at an emergency shelter are offered a bed in the emergency shelter where they arrive (if population appropriate and bed available). If they present at a shelter that is not for their population, then they are referred to the appropriate shelter. Shelters serve as access hubs. Households who enter shelter outside of coordinated entry intake hours will be offered an assessment by coordinated entry staff at the shelter or referred to other CE staff at the next available time.

## Nondiscrimination

The CE system and CoC, ETH, ESG funded and another 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 perceives 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, nonreligion 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 accommodations, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

If you feel you have been treated unfairly due to any of the above reasons, you may file a discrimination complaint. Information on how to file a complaint can be found on the City of Madison's website at <http://www.cityofmadison.com/dcr/civilRights.cfm>. Information and complaint forms are available at assessment hubs. Assessment hubs will post information on how/where to file a complaint.

## **Accessibility**

Assessment Hubs may be accessed by all people who are experiencing homelessness or at risk of homelessness and who are currently in Dane County. 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.

Coordinated Entry staff will provide regular office hours throughout the County to accommodate those in outlying areas. If a household needs to get to Madison for shelter services, staff will explore transportation options. Transportation needs will be researched and a plan will be in place by October 1, 2018.

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

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

Assessment Hubs must be accessible to individuals who use wheelchairs.

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

## **Marketing**

Marketing materials will be targeted to those who may be least likely to access services. Data will be used to identify potentially underserved groups and will target the marketing plan to them. Outreach workers act as Mobile Assessment Hubs and engage with those who traditionally don't 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 perceives 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, nonreligion 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 customers. 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 Dane County Homeless Services Consortium (HSC) website. Up to date materials and information will be available via the 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**

### **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 helps to identify who is recommended for each housing and support intervention based on who is eligible and in the greatest need of that intervention. The VI-SPDAT assesses households based on history of housing and homelessness, risks, socialization and daily functioning and wellness.

Households seeking assistance for homeless prevention must meet the minimum HUD requirements for eligibility and must meet one of the following:

- Experienced homelessness in an emergency shelter, safe haven or place not meant for habitation within the past five years; or
- Have a household of six or more; or
- Live in and need an accessible housing unit. (Written Standards, Prevention Section)

### **Assessment Process**

When households present to CE, they will receive referral 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 Community Wide 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, a place not meant for human habitation, Safe Haven or Transitional Housing. Staff will double check ServicePoint 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.

When a household is referred to the 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 HMIS.

If a household presents as two adults with no minor children, a Singles VI-SPDAT should be completed for each individual. Each individual should be referred to the singles list and note in HMIS who they would like to live with (under housing placement group notes). When one person comes up on the priority list, the outreach worker will check in with the person and their significant other individually to be sure they want to live together.

If working with an unaccompanied minor, complete the TAY-VI-SPDAT and refer to the priority list six months prior to their eighteenth birthday. In addition, a referral to Briarpatch should be provided.

A household may be re-assessed with the VI-SPDAT if there is a major life change. Anything that would cause the VI-SPDAT score to change is considered a major life change. A major life change includes, but is not limited to the following: change in household members, change in health status, additional interactions with emergency services (enough to change score).

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

A household may refuse to complete the assessment. If a household refuses to complete the assessment, outreach staff must continue to work to engage with them. It is important to continue to learn their needs and document them for appropriate housing/service provision. While working with the household to get further information, outreach staff will make a referral to the 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 a 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 record.

## **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. 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.

## **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 priority list that providers have a sense of what the household wants. When a household is in the top 30 names of the priority list they will receive information on the participating coordinated entry housing programs that may be available to them. Households will be offered an Application of Participant Interest to complete. The application must be uploaded in HMIS to be used at Housing Placement meetings.

## **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 Assessment Staff includes:

- HMIS Licensure
- Coordinated Entry Policies & 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 & 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 a protected basis (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 or Category 4 homelessness may be placed on the Community Wide Housing Priority List. Households placed on the list will be prioritized based on chronic homeless status, length of time homeless 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 refuse or are unable to complete the VI-SPDAT and meet one of the community's priorities will be placed on the Community Wide Housing Priority List.

Exceptions may be made to the above prioritization policy in rare circumstances for households who are extremely vulnerable. This includes households in the following circumstances:

- Unable to complete the VI-SPDAT due to a mental health barrier, a severe cognitive disability or traumatic brain injury.
- Emergency medical priority where there is vulnerability to illness and death; including high utilization of crisis or emergency services.
- Significant challenges or functional impairments, including physical, mental, developmental or behavioral health challenges, which requires a significant level of support in order to maintain permanent housing and for which granting permission to conduct a VI-SPDAT may not be appropriate.
- Vulnerability to victimization based on race, gender, status, sexual orientation, physical assault, trafficking and sex work.

The following will be taken into consideration for exceptions:

- The number of ambulance calls within the last month
- The participant's score for the medical questions on the VI-SPDAT/VI-F-SPDAT

- Written documentation from a medical health professional

OR

- Consensus among outreach workers

The procedure for granting an exception begins with discussing the person's situation at the regularly scheduled meetings of outreach staff. Anyone can bring an exception to the meeting for discussion. The case is presented and those present who regularly attend outreach meetings will take a vote on whether or not to grant the exception (majority rules).

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 Prevention Section of the Written Standards). The tool considers the following factors in prioritization:

- Eviction Process
- Eviction history
- Lives in subsidized housing
- History of homelessness
- Disability/ Needs accessible unit
- Large Family
- Criminal History
- Domestic Violence

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**

### **Housing Placement Meetings**

There is a Housing Placement meeting for Single Adults and one for Families with Children. These meetings occur twice each month. The Coordinated Entry manager leads the meetings. The CE manager will provide a list of households (non-identifiable client ID numbers) to discuss 5 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 7 days prior to the scheduled meeting. A representative for each housing provider must be present at each meeting. If a representative is not available, advance arrangements must be made with the CE manager.

When a household is at the top of the priority list and a match is being made, their preferences must be considered by accessing their Application of Participant Interest. 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 rejects a placement.

Households must 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, ETH and ESG funded programs must use the Coordinated Entry process as the only referral source from which they fill vacancies in housing or services.

### **Contacting People on the Priority list**

If staff is completing data clean-up of the 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 3 times over the course of a two-month period. Contacts must be recorded in HMIS under the CE follow-up section. 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, cancel the referral to the priority list.

Best practices for contacts:

- Attempt contact during different times of the month (beginning, middle, end)
- Contacts should be made over the course of two months, 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, you may use an agency Facebook page to attempt contact

### **Be On the Lookout (BOLO) List**

If a name comes up at the housing placement meeting and the person is not currently available to accept housing (incarcerated, institution, etc.), but there is reason to believe that within 90 days they will return to the community, please move the referral to the BOLO list. The BOLO list will be reviewed at outreach meetings. Every 90 days the

outreach group will re-evaluate if someone should remain on the BOLO list. In most cases, people will not remain on the BOLO list for more than 90 days. The referral will be canceled if the person will not be back in the community within a reasonable time frame.

### **Holding a Unit**

When an agency receives a name from the priority list, staff must initiate contact with the person within seven business days. (see best practices above) There may be circumstances where two agencies work together to connect with someone. It is the receiving agency's responsibility to ensure contact. If staff attempts contact on three occasions during the seven business days and do not get a response, they may move to the next household on the priority list.

### **Grievance**

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](http://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. Agency's grievance policies should be posted on their website.

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](http://www.danecountyhomeless.org)) via the contact us function, [hsc@cityofmadison.com](mailto: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 5 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 5 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 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 Institute for Community Alliances (ICA). The training covers the privacy rules associated with collection, management and reporting of client data.

Coordinated Entry staff will receive household consent through a signed 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 which the household has provided written consent. Households will not be denied services for refusal to have their information shared in HMIS.

## **Evaluation**

The Coordinated Entry System (including policies and procedures) is evaluated annually by both households accessing the system and 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 are distributed to households at participating agencies included, 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 must be kept private. Surveys will be kept confidential and identifying information will not be collected.

The annual survey for both groups will be developed by the Core Committee and distributed according to a timeline set by the Core Committee. The CE Manager will present the survey results and an implementation plan for changes to the Core Committee.

The Core Committee will receive monthly updates from the CE Manager. The CE Manager will seek feedback monthly, from the Core Committee, in order to have ongoing evaluation of the system.

The Core Committee and HSC Board of Directors will review the CoC's System Performance Measures every 6 months, consider how the system is affecting Performance Measures and what changes can be implemented to improve performance.

## APPENDIX E: LIST OF ACRONYMS

CE – Coordinated entry

CoC – Continuum of Care

CoC Program – Continuum of Care Program – funded by HUD

EFS – Emergency Family Shelter

ESG – Emergency Solutions Grant – funded by HUD

ETH – Emergency Solutions Grant/Transitional Housing Program/Homeless Prevention Program – a combination of funding from HUD and the State of Wisconsin

HMIS – Homeless Management Information System

HSC – Homeless Services Consortium

HUD – Department of Housing and Urban Development



PSH – Permanent supportive housing

RRH – Rapid Re-housing

SPDAT – Service Prioritization Decision Assistance Tool

TH – Transitional housing

VA – Department of Veterans Affairs

VI-SPDAT – Vulnerability Index-Service Prioritization Decision Assistance Tool

VI-F-SPDAT – Vulnerability Index-Family Service Prioritization Decision Assistance Tool

## APPENDIX F: WEBSITES FOR ADDITIONAL INFORMATION

Dane County Homeless Services Consortium

<http://www.danecountyhomeless.org/>

National Alliance to End Homelessness

<http://www.endhomelessness.org/>

U.S. Department of Housing and Urban Development, HUD Exchange

<https://www.hudexchange.info/>

U.S. Interagency Council on Homelessness

<https://www.usich.gov/>

## APPENDIX G: LIST OF DOCUMENT REVISIONS

4/4/2016

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Original version approved by the Madison/Dane County CoC Board of Directors.

8/26/2016

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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

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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

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Added prevention program standards.

5/19/2017

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Board approved update to Street Outreach standards and approved Diversion standards and Diversion tool.

11/16/2017

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Board approved addition of Emergency Transfer section.

01/19/2018

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Board approved addition of Coordinated Entry Policies and Procedures appendix.

09/21/2018

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Board approved revisions to Section 1.

10/19/2018

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Board approved addition of Transfer Request Form appendix.

## APPENDIX H: 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.?**

**b. 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 I: CERTIFICATION FOR EMERGENCY TRAFER

### 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 J: GLOSSARY

### **Domestic Violence**

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, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

### **Dating violence**

Dating violence means 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:
  - (i) The length of the relationship;
  - (ii) The type of relationship; and
  - (iii) The frequency of interaction between the persons involved in the relationship.

### **Sexual Assault**

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

### **Stalking**

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

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

## APPENDIX K: PREVENTION PRIORITIZATION TOOL

### Prevention Prioritization Tool

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

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

**APPENDIX L: TRANSFER REQUEST FORM**

**Transfer Request Form**

To be completed by program coordinator or property manager and submitted to CE manager.

Date: \_\_\_\_\_ Name of Staff Requesting Transfer: \_\_\_\_\_

Head of Household Name: \_\_\_\_\_

Current Housing Program: \_\_\_\_\_ Program Entry Date: \_\_\_\_\_

# of People in Household: \_\_\_\_\_ # of Youth Ages 16+: \_\_\_\_\_ Date discussed at Case Manager Meeting: \_\_\_\_\_

Disability Documentation Attached?  Yes  No Homeless History Documentation Attached?  Yes  No

Please list the lease violations: \_\_\_\_\_

\_\_\_\_\_

Please describe what strategies program staff have already used: \_\_\_\_\_

\_\_\_\_\_

In what ways do program staff think a transfer will make a difference?: \_\_\_\_\_

\_\_\_\_\_

How does the participant think a transfer will affect the possibility of future lease violations?: \_\_\_\_\_

\_\_\_\_\_

What does the participant want regarding their housing?: \_\_\_\_\_

\_\_\_\_\_

Where is the landlord at in the eviction process? \_\_\_\_\_

\_\_\_\_\_

Has participant been referred to Legal Action and/or Tenant Resource Center? \_\_\_ Yes \_\_\_ No

Supervisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

If granted, the transfer should be completed within 30 days.

.....  
**Coordinated Entry Manager Use**      Transfer was: \_\_\_ granted \_\_\_ denied

Participant will transfer to the following program: \_\_\_\_\_

**Goal 1: Prevent Homelessness**

Actions	Measures	2019 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	80
	Number of households that received homeless prevention legal services	234
	Number of households that received homeless prevention mediation services	70
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	400
	Percentage of households that received diversion services and did not return to shelters for the following 60 days	50%

**Goal 2: Reduce the Length of Time People Experience Homelessness**

Actions	Measures	2019 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	200
	Percentage of households that exited to permanent housing by street outreach programs	40%
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	50%
	Average length of time individuals and households remain at shelters	38 days
Provide rapid rehousing rent assistance and supportive services to individual and family households	Number of individuals that received rapid rehousing assistance	36
	Number of family households that received rapid rehousing assistance	97
	Percentage of individual and family households that exit to permanent housing by rapid rehousing programs	70%

**Goal 3: Increase Housing Stability**

Actions	Measures	2019 Proposed Achievement
Provide permanent supportive housing to chronically homeless individuals and families including veterans	Number of individuals served in permanent supportive housing programs	451
	Number of family households served in permanent housing programs	132
	Percentage of individual and family households that exited to other permanent housing or retained permanent supportive housing	90%

### **City of Madison Recapture Policy**

The Community Development Division will use recapture provisions for all assistance provided as direct subsidies allowable in homebuyer activities per 92.254. This provision will be the policy for all homebuyer assistance programs administered by the City of Madison and/or any direct subsidies provided by a subrecipient or developer.

Direct subsidies are defined as the mortgage reduction assistance and closing costs awarded to the homebuyer to purchase the property. Direct subsidies provided to homebuyers are given in the form of a 0% interest-bearing loan with shared appreciation due upon the sale, transfer of title, or the unit no longer remaining owner-occupied. CDD will recoup the amount invested in the property, plus shared appreciation. The calculation of the recapture amount is based on the net proceeds available from the sale, rather than the entire amount of the HOME investment. "Net proceeds" is defined as the sales price, minus superior loan repayment and any closing costs incurred by the borrower(s).

Recapture provisions permit homebuyers to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. CDD will record with the Register of Deeds a mortgage and a written agreement between the homebuyer and the City of Madison to enforce the recapture provisions and period of affordability requirements of 92.254 on each property. At the time of sale, CDD will be notified by either the homeowner or the title company, requesting a review of the recapture amount and removal of the lien on the property.

When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit and the net proceeds are not sufficient to recapture the full HOME investment, then the City of Madison will recapture the net proceeds (if any).