
2025 Consolidated Annual Performance & Evaluation Report [CAPER]

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

During 2025, the City's Community Development Division (CDD) maintained its focus on efforts designed to expand the supply of affordable housing, provide opportunities for new microenterprise businesses, create jobs, and support a local service network that will reduce homelessness in our community and make future incidences of homelessness rare, brief, and non-reoccurring.

CDD continued to lead the City's efforts to expand its housing supply by implementing the City's Housing Forward initiative. The Housing Forward initiative was created to expand and improve the supply of housing in Madison. One goal within Housing Forward is to create affordable housing throughout the City. The City partners with developers to use City and Federal funds strategically to leverage other financing; most notably, Federal Low-Income Housing Tax Credits (LIHTCs) administered by the Wisconsin Housing and Economic Development Authority (WHEDA). During the course of 2025, the City evaluated and committed nearly \$14 million through the City's Affordable Housing RFP Processes to four development proposals that focus on creating or preserving rental units. These developments will construct or preserve 425 units of housing, of which nearly 263 will be designated as affordable. All of these developments are LIHTC developments that will leverage over \$54 million in LIHTCs.

During the period covered by the 2025 Annual Action Plan (AAP), the City again focused its federal funds on primary Plan objectives affecting affordable housing, economic development, and neighborhood resources.

2025 highlights include these major activities, completed by the Division or its funded agencies:

1. Stable investment in the community.

The City invested over \$13.3 million in the community to address the goals and objectives outlined in Madison's 2025-2029 Consolidated Plan, which includes nearly \$5.5 million in City AHF funding for the development and rehabilitation of owner-occupied and rental housing. The three primary focus areas were (a) housing development and financing; (b) small business assistance; and (c) neighborhood asset building. Despite uncertainty surrounding the stability of funding related to delays in the execution of the City's FY25 HUD grant agreements, CDD was still able to maintain its financial commitments to several partner agencies using on-hand program income and strived to support needed programs with as few service disruptions or project delays as possible.

2. Sustained support of economic development efforts.

In 2025, CDD's support for organizations involved with job creation actually exceeded the annual goals established in the City's Strategic Plan. Three new businesses were provided with CDBG-funded loan assistance during the program year, and 31 new positions were reported before the end of December at businesses that received the same type of loan assistance in prior program years. Job creation progress from the 3 new loans will be reported in future CAPERs.

3. Expansion of the City's support for affordable housing.

CDD provided funding to agencies for efforts to improve household stabilization and to acquire and rehabilitate housing stock in targeted neighborhoods within the City, with the final goal to ensure low- to moderate-income households gain access to those homes. These efforts promoted household stabilization in a variety of ways by improving housing stock and supporting access to homeownership to households that often face barriers in that market. Federal funds were also committed to ensure first-time homebuyers received assistance to make mortgages attainable and affordable.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the Consolidated Plan and explain, if applicable, why progress was not made toward meeting goals and objectives.

91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Accomplishments - Program Year & Strategic Plan to Date – 2025

Plan Goal	Indicator	Unit of Measure	ConPlan Program Year	Funding Source	Total Expenditures	Achievement Toward ANNUAL ACTION PLAN ("AAP") and CONSOLIDATED PLAN ("ConPlan") Targets				
						ACCOMPLISHMENTS		Percent Progress Toward Target		
						Actual	Expected			
Housing Development & Financing: Homeownership	Homeowner Housing Rehabilitation	Number of Housing Units Rehabbed	2025 (Year 1)	CDBG	—	10				
				HOME	—	4				
				City	—	1				
			THIS PROGRAM YR	All Funding Sources	—	15	100	15.00%		
			<i>Remaining Outyears</i>						400	
	5-YEAR TOTAL	All Funding Sources	—	15	500	3.00%				
	Homeowner Housing Added:	Number of Housing Units Added	2025	City	\$193,110	4				
				THIS PROGRAM YR	All Funding Sources	\$193,110	4	2	200.00%	
				<i>Remaining Outyears</i>						9
			5-YEAR TOTAL	All Funding Sources	\$193,110	4	11	36.36%		
			Homebuyers Provided with Direct Financial Assistance	Number of Households Assisted	2025	CDBG	\$111,300	3		
	HOME	\$1,250,508				35				
City, WI HCRI	\$980,000	28								
THIS PROGRAM YR	All Funding Sources	\$2,341,808			66	60	110.00%			
<i>Remaining Outyears</i>						240				
5-YEAR TOTAL	All Funding Sources	\$2,341,808	82	300	27.33%					
Housing Development & Financing: Rental Housing	Rental Units Constructed	Number of Units Constructed	2025	HOME	\$2,377,326	11				
				City	\$3,845,224	246				
			THIS PROGRAM YR	All Funding Sources	\$6,222,550	257	55	467.27%		
			<i>Remaining Outyears</i>						220	
	5-YEAR TOTAL	All Funding Sources	\$6,222,550	129	275	46.91%				
	Rental Units Rehabbed	Number of Units Rehabbed	2025	CDBG	\$704,399	74				
				City	\$1,427,721	32				
THIS PROGRAM YR			All Funding Sources	\$2,132,120	106	71	149.30%			
<i>Remaining Outyears</i>						282				
5-YEAR TOTAL	All Funding Sources	\$2,132,120	361	353	102.27%					

Plan Goal	Indicator	Unit of Measure	ConPlan Program Year	Funding Source	Total Expenditures	ACCOMPLISHMENTS		Percent Progress Toward Target		
						Actual	Expected			
Homeless Services & Housing Stability	Shelter Provided to Homeless	Number of Persons Assisted	2025	CDBG	\$333,844	1,765				
				ESG	\$60,000	1,087				
				City, WI EHH	\$70,532	—				
			THIS PROGRAM YR	All Funding Sources	\$464,376	2,852	2,600	109.69%		
			<i>Remaining Outyears</i>						10,400	
	5-YEAR TOTAL	All Funding Sources	\$464,376	0	13,000	0.00%				
	Persons Assisted with Rapid-Rehousing (RRH) & Tenant Based Rental Assistance (TBRA)	Number of Persons Assisted	2025	HOME TBRA	—	—				
				ESG	—	—				
				City, WI EHH	\$293,296	123				
			THIS PROGRAM YR	All Funding Sources	\$293,296	123	30	410.00%		
			<i>Remaining Outyears</i>						120	
	5-YEAR TOTAL	All Funding Sources	\$293,296	0	150	0.00%				
	Homelessness Prevention Services	Number of Persons Assisted	2025	ESG	\$58,290	53				
				City, WI EHH	\$185,351	—				
				THIS PROGRAM YR	All Funding Sources	\$243,641	53	85	62.35%	
			<i>Remaining Outyears</i>						340	
			5-YEAR TOTAL	All Funding Sources	\$243,641	0	425	0.00%		
	Persons Assisted with Other Homeless Services (incl Street Outreach)	Number of Persons Assisted	2025	ESG	\$12,097	511				
				City, WI EHH	\$64,504	—				
				THIS PROGRAM YR	All Funding Sources	\$76,601	511	400	127.75%	
<i>Remaining Outyears</i>						1,600				
5-YEAR TOTAL			All Funding Sources	\$76,601	0	2,000	0.00%			
Persons Assisted through Housing Resources (incl Fair Housing)	Number of Persons Assisted	2025	CDBG	\$41,000	N/A					
			City	\$400,147	5,900					
			THIS PROGRAM YR	All Funding Sources	\$441,147	5,900	2,000	295.00%		
		<i>Remaining Outyears</i>						8,000		
		5-YEAR TOTAL	All Funding Sources	\$41,000	0	10,000	0.00%			
Small Business Assistance	Micro-Enterprise Assistance	Number of Persons (Entrepreneurs) Assisted	2025	CDBG Only	—	0	1,400	0.00%		
			<i>Remaining Outyears</i>						5,600	
			5-YEAR TOTAL	CDBG Only	\$0	0	7,000	0.00%		
	Job Creation & Business Expansion	Number of Jobs Created	2025	CDBG Only	\$490,000	31	15	206.67%		
			<i>Remaining Outyears</i>						60	
			5-YEAR TOTAL	CDBG Only	\$490,000	31	75	41.33%		

Plan Goal	Indicator	Unit of Measure	ConPlan Program Year	Funding Source	Total Expenditures	ACCOMPLISHMENTS		Percent Progress Toward Target
						Actual	Expected	
Neighborhood Asset Building	Neighborhood Revitalization Plans and Projects	Number of Persons Assisted	2025	CDBG Only	\$144,135	3,440	1,200	286.67%
			Remaining Outyears		4,800			
			5-YEAR TOTAL	CDBG Only	\$144,135	3,440	6,000	57.33%
	Capital Improvements of Public Facilities or Infrastructure	Number of Persons Assisted	2025	CDBG	—	—		
				City	\$704,459	—		
			THIS PROGRAM YR	All Funding Sources	\$704,459	0	10,800	0.00%
Remaining Outyears		43,200						
5-YEAR TOTAL	All Funding Sources	\$704,459	0	54,000	0.00%			
Program Administration	Planning / Administration	Number of Contracts Administered	2025	All Funding Sources	\$822,163	59	100	59.00%
			Remaining Outyears		400			
			5-YEAR TOTAL	All Funding Sources	\$822,163	59	500	11.80%

Due to multiple factors during 2025, the City's FY25 CDBG, HOME and ESG grant agreements were not fully executed with HUD until December.

The City has customarily operated on a reimbursement basis when it comes to its HUD grants, paying subrecipients using City funds initially and then subsequently requesting commensurate grant reimbursement from HUD. To mitigate risk to the City from any potential reduction of the annual award by HUD in 2025, the City's Finance Department advised CDD not to move forward with issuing its 2025 subrecipient contracts that were to be funded by these FY25 HUD grants, until such time as the City was in possession of the fully executed HUD grant agreements.

As a consequence of the City implementing this measure, only a small handful of contracts (funded with on-hand program income) were permitted to move forward prior to the December execution of the FY25 HUD grant agreements. This left several programs with paused operation of services during 2025. As summarized in the table above, the progress reported by the City toward its original FY25 Annual Action Plan (AAP) goals was not as robust as initially projected.

CDD is currently negotiating 2026 written agreements with the subrecipients affected, with the intent to include allocations of both 2025 and 2026 HUD funds in their 2026 contracts. These will be described in more detail in the City's forthcoming FY26 Annual Action Plan.

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

In 2025, the City of Madison's use of federal HUD funds, particularly CDBG, was consistent with the goals, priorities, and objectives described in both its 2025-2029 Consolidated Plan and its 2025 Action Plan. The City's primary emphasis was on affordable housing, including housing development and financing, housing stability, and homeless services. In addition, the City invested significant resources in its neighborhood asset building goal.

CR-10 - Racial and Ethnic Composition of Families Assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

Assistance to racial and ethnic populations by source of funds

	CDBG	HOME
White	2,282	21
Black or African American	1,200	14
Asian	204	8
American Indian or American Native	73	1
Native Hawaiian or Other Pacific Islander	6	0
Total	3,765	44
Hispanic	1,402	11
Not Hispanic	2,529	33

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	21
Asian or Asian American	7
Black, African American, or African	840
Hispanic/Latina/e/o	45
Middle Eastern or North African	1
Native Hawaiian or Pacific Islander	1
White	519
Multiracial	148
Client doesn't know	0
Client prefers not to answer	61
Data not collected	13
Total	1,656

The racial and ethnic composition of individuals and families assisted by the CDD was generally in line with expectations for 2025.

Of the 5,587 persons assisted by the City's CDD in 2025, 2,822 (51%) were White; 2,054 (37%) were Black or African American; 219 (4%) were Asian or Asian American; 102 (2%) were American Indian, American Native, Native Hawaiian or Other Pacific Islander. 390 (7%) were multi-racial or other. 1,458 (26%) were Hispanic.

Identify the resources made available.

Source of Funds		Anticipated Total Resources Made Available During 2025-2029 Consolidated Plan	Amount Expended During 2025 Program Year
CDBG		\$ 15,609,335	2,286,734
HOME		21,374,234	3,854,248
ESG		926,088	143,370
Other Sources	City of Madison	116,972,033	15,395,118
	EHH (ESG / HAP / HPP)	3,187,228	528,279
	HCRI	1,112,282	288,236

In 2025, the CDD used a diverse array of federal, state and local funds to support programs and projects across its three primary goal areas.

Identify the geographic distribution and location of investments.

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
n/a	n/a	n/a	n/a

The City CDD does not undertake geographic targeting, per se. Its approach to geographic allocation of funds is to support core service activities that address community-wide concerns while simultaneously focusing some resources on targeted high-needs neighborhoods. This system primarily benefited low- and moderate-income households defined as those with incomes of less than 80% of the area median (hereafter referred to as LMI). City CDD-funded activities occurred primarily in census tracts in which 51% or more of households met the HUD LMI standard of 80% or less of area median income.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

In 2025, the CDD secured and put to use other public resources to address local community development priorities. In 2025, the City of Madison was awarded the following State of Wisconsin funds:

- Emergency Solutions Grant (ESG)
- Homelessness Prevention Program (HPP)
- Housing Assistance Program (HAP)
- Housing Cost Reduction Initiative (HCRI)

During 2025, the City's CDD worked with community agencies, neighborhood groups, private businesses, and public sector partners to leverage additional community and neighborhood development resources. In many cases, the CDD was the first agency to fund a project, thus helping to leverage additional public and private funds.

Federal resources from HUD leveraged City of Madison general purpose revenue (GPR) to support programs and projects throughout the City. Based on the priority given to homelessness prevention and homeless services and the federal spending caps, the City continued to supplement key public service activities, with a particular focus on homelessness. The total City commitment to these CDD-funded activities amounted to roughly \$3.37 million in 2025.

In years where HOME funds were committed, the City of Madison seeks a match of 25% of granted funds from each sub-recipient agency or developer that receives HOME funds. In 2025, the City collected Match for a HOME-funded rental development and for a HOME-funded homeownership loan administered by one of the City's sub-recipients. A total of \$1,010,000 was reported as a HOME Match contribution for 2025. For ESG projects, funded agencies were required to provide a one-for-one match. The City CDD provided the required match for ESG administrative funds. A total of \$1,010,000 in HOME funds was matched by agencies, as noted above, while \$152,035 in ESG Match funds was contributed from federal funds allocated by HUD (CDBG) and HHS (CSBG), along with local City General Purpose Revenue (GPR).

Fiscal Year Summary - HOME Match Report

1. Excess match from prior Federal fiscal year	\$ 12,903,973
2. Match contributed during current Federal fiscal year	1,010,000
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	13,913,973
4. Match liability for current Federal fiscal year	140,778
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$ 13,773,195

Match Contribution for the Federal Fiscal Year

Project No. or Other ID	Date of Contribution	Cash <i>(non-Federal sources)</i>	Foregone Taxes, Fees, Charges	Appraised Land / Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Bayview DR028.19	11/25/2024						990,000	990,000
MOI BK207.25	09/30/2025	20,000						20,000

HOME MBE/WBE report

Program Income

Enter the program amounts for the reporting period.

Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$ 2,599,668	\$ 551,305	\$ 1,213,021	\$ 0	\$ 1,937,952

Minority Business Enterprises and Women Business Enterprises

Indicate the number and dollar value of contracts for HOME projects completed during the reporting period.

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	1	0	0	0	0	1
Dollar Amount	\$ 42,848,303	\$ 0	\$ 0	\$ 0	\$ 0	\$ 42,848,303
Sub-Contracts						
Number	15	1	0	1	4	9
Dollar Amount	\$ 8,308,925	\$ 6,265	\$ 0	\$ 153,500	\$ 2,256,783	\$ 5,892,377

	Total	Women Business Enterprises		Male	
Contracts					
Number	1		0		1
Dollar Amount	\$ 42,848,303		\$ 0		\$ 42,848,303
Sub-Contracts					
Number	15		11		4
Dollar Amount	\$ 4,278,860		\$ 6,052,142		\$ 2,256,783

Minority Owners of Rental Property

Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted.

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

Relocation and Real Property Acquisition

Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition.

	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Parcels Acquired						
		Number		Cost		
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced						
		Minority Property Enterprises				
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	White Non-Hispanic
Number	0	0	0	0	0	0
Cost	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

Number of Households

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	286	135
Number of Special-Needs households to be provided affordable housing units	2	2
Total	288	137

Number of Households Supported

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through the Production of New Units	57	11
Number of households supported through Rehab of Existing Units	171	88
Number of households supported through Acquisition of Existing Units	60	38
Total	288	137

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

For 2025, differences between one-year goals and actual outcomes have to do primarily with the timing of large affordable housing development projects supported by the City's Affordable Housing Fund in concert with Low-Income Housing Tax Credits. The City saw three completed developments that were funded through the Affordable Housing Fund, which was indicative of project timelines previously delayed by pandemic supply-chain shortages in the development process. There are also four developments scheduled for completion in 2026 attributable to the pent-up demand for affordable housing in the tight Madison housing market.

Discuss how these outcomes will impact future annual action plans.

Units completed as part of AHF/LIHTC-supported projects in 2026 will be reflected in the City's 2026 CAPER. Future annual action plans will continue to incorporate LIHTC projects on a schedule that accurately reflects the number of awards provided in a given year and takes into account the latest construction timelines to ensure a more accurate estimate of likely outcomes. In 2026, CDD will continue to be aggressive at seeking out development proposals that can leverage federal and other non-governmental funding sources. Additionally, the City's Common Council had previously committed additional funding to the AHF, which will allow the City to increase the supply of development proposals that leverage funding sources other than tax credits. This should yield an increase in the number of assisted households in the 2026 and 2027 CAPERs, as CDD will be releasing RFPs for non-Tax Credit developments in 2026 and expects funds to be committed the same calendar year.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served

	CDBG Actual	HOME Actual
Extremely Low-income	8	32
Low-income	19	6
Moderate-income	60	12
Total	87	50

The City of Madison distributed its federal funds in ways which supported households across multiple income bands. Persons who were extremely low-income, low-income, and moderate-income were served by the production, rehabilitation and

acquisition of affordable homeowner, homebuyer, and rental housing units in 2025, with HOME and CDBG beneficiaries being evenly dispersed across the three income levels.

In addition to the activities that specifically address impediments to fair housing (as described in section CR-35 of this report), CDD encourages new construction developments to submit proposals with universal design, increasing the number of income- and rent-restricted accessible units for persons with disabilities in the community. In housing developments that are funded by CDD and WHEDA Low Income Housing Tax Credits (LIHTCs), the units are targeted to populations experiencing homelessness and in need of supportive services. Beyond the expansion of new units, CDD supports rehabilitation of units in the community to address substandard housing and increase housing quality for lower-income households; this includes rental and owner-occupied units. Non-profit housing developers that target households with disabilities are eligible and encouraged to apply.

CR-25 - Homeless and Other Special Needs

91.220(d,Ze); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

➤ ***Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.***

Based on feedback from providers, program participants, and information from other communities, the CoC, with leadership from the City of Madison, implemented changes to the Coordinated Entry System. All individuals and households are connected to Coordinated Entry upon enrollment into street outreach or emergency shelter (including domestic violence shelters) programs. Individuals and households no longer need to take an extra step to be connected to Coordinated Entry for assessment. The CoC has implemented a two-tier assessment process. The first tier assesses all people enrolled in street outreach and emergency shelter programs using information in the Homeless Management Information System (HMIS), including some new questions asked at program enrollment. Based on housing program availability, the households scoring highest in the ranges for Permanent Supportive Housing and Rapid Rehousing will be invited to complete a full assessment. The CoC will continue to use the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) designed by OrgCode Consulting, LLC, as the full assessment. The community uses the VI-SPDAT tools that are specific to families and to transition age youth to account for their unique needs. Staff trained in administering the VI-SPDAT will receive notification of those invited to complete the assessment and connect with households they know. All staff with coordinated entry duties ensure that assessments are entered into HMIS accurately. The new system has been in place for almost one year. The CoC is currently evaluating the changes and making adjustments to improve the process for both participants and providers. The goal is to have a trauma-informed process.

The CoC was awarded funding in 2023 through the Department of Housing and Urban Development's Special Notice of Funding Opportunity to Address Unsheltered Homelessness. The City of Madison, as the Collaborative Applicant, led the application process. One of the projects awarded is to provide coordination of street outreach services and a simple way for people to connect with services. The funded agency has set up a phone number, web-based form, and email address that people sleeping unsheltered can call to connect to services. The agency also has staff who maintain walk-in hours at their centrally located office. When people connect with the Street Outreach Coordinator, a basic assessment is completed, and a referral is made to the team that will best meet their unique needs. Concerned community members can also contact the coordinator if they are aware of someone sleeping unsheltered. A team is assigned to find the household and talk with them about services.

The City of Madison financially supports street outreach teams to reach out to unsheltered individuals to complete needs assessment and connect to shelter and other services. Outreach providers meet bi-monthly to ensure that individuals are connected to outreach services that meet their needs, share information and resources, and develop connections to housing opportunities. Street outreach providers have worked together to identify the populations and geographic areas they serve to avoid duplication of services. Street outreach workers are collaborating and addressing immediate needs of this vulnerable population of people living on the streets.

➤ ***Addressing the emergency shelter and transitional housing needs of homeless persons.***

The City of Madison supports the operations and case management at emergency shelters in the Dane CoC. The City assists shelters to ensure their programs are quickly assisting households to move into permanent housing. To do this, the City supports a variety of support services such as case management, job training, and rapid re-housing. The City reviews performance outcomes such as average length of stay (HUD Performance Measure 1) to ensure the shelters are high performing. All shelters must participate in Coordinated Entry and shelter providers meet bi-monthly to address concerns and improve services. To help support emergency shelters, the City supports the Day Resource Center, which can provide additional case management needs for homeless individuals. Shelter staff are seeking ways to partner with other providers to bring services to shelter guests that will assist them in connecting to housing and meeting other needs.

The City is leading efforts to construct a purpose-built men's shelter. City staff have engaged with community members, homeless service providers and shelter guests to learn about features and services they hope to see in a new facility. The City is working with the CoC to explore how to create a housing-focused shelter which may include co-location of existing services. The City will also be involved with the planned development of a purpose-built shelter to serve women and households with children.

Currently, the Dane CoC does not have much transitional housing stock. There are limited population-specific transitional housing programs in the CoC (veterans, families, youth).

➤ ***Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.***

The City took the following actions funded with federal, state, and local funds, as outlined in the *Dane Forward: A Five-Year Plan to Prevent and End Homelessness*:

- Provided support services to assist people in maintaining their housing. Support services include case management, job coaching and employment searches, obtaining mainstream resources, connecting to behavioral health services, helping with childcare and parenting support, budget counseling and protective payees when warranted, accessing transportation, and learning how to communicate with landlords and neighbors.
- Provided safety net housing in the form of emergency shelter until more permanent, stable housing can be obtained.
- Continued working with developers to create units with supportive services that are specifically for households experiencing homelessness.
- Continued to strengthen relationships with Public Housing Authorities to ensure households are able to lease up and maintain their housing
- Developed relationships and meet regularly with health care systems to avoid discharge from health care facilities into homelessness
- Provided support to agencies as they implement 1915i, allowing them to bill Medicaid for housing support services

Since the COVID pandemic and the acceptance of virtual meetings, the CoC has developed relationships at the State level to help prevent households from entering into homelessness. The CoC provides education to State agencies on services available within the CoC. Discussions are ongoing to identify areas of collaboration. The Wisconsin CoCs and representatives from State agencies meet on a regular basis to discuss needs and solutions for people experiencing homelessness. Wisconsin's Department of Health Services meets bi-monthly with the CoC's across the State. The group is exploring ways DHS-funded programs and homeless services can work together.

The Dane CoC was selected in Fall 2022 for HUD's Youth Homelessness Demonstration Project (YHDP) and was awarded nearly \$2.5 million. These funds have resulted in youth-focused System Navigation services and a Joint Transitional Housing-Rapid Rehousing program that have continued during 2025.

Healing House is a project operated by JustDane (formerly Madison-Area Urban Ministry) and provides medical respite services to households with children. The County Jail reentry staff work closely with the CoC in an attempt to avoid discharge into homelessness. The CoC has a working relationship with the Employment and Training Network to proactively align homeless services with employment services. City of Madison staff are working closely with the CoC to learn more about the needs of youth experiencing homelessness, who are also accessing employment services. Information learned will inform future City funding processes to serve this population.

The City's actions to prevent homelessness were accomplished by funding activities that included housing counseling and financial assistance in the form of rent in arrears and short-term rent subsidies to help tenants maintain their housing. COVID-response funds have been instrumental in the efforts to prevent homelessness. Services included the following prevention activities:

- short-term rent subsidies
- rent payments
- housing mediation with landlords and tenants who are being evicted, in order to prevent eviction.

The City provides funding for diversion practices into the homeless services system. Households who had a safe place to stay, but needed support to do so, are offered financial and support services. The CoC believes that shelter space should be available to those who have no other safe alternatives. If a household has a safe space to be, the CoC will support that and provide assistance to secure permanent housing. As diversion services are implemented, we see that some households obtain permanent housing without ever needing to enter emergency shelter.

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

The CoC provides shelter case management/outreach services to people experiencing homelessness with the purpose of assisting with the transition to permanent housing and independent living. The services provided are housing-focused to shorten the length of time that people experience homelessness. In addition, the CoC uses Rapid Re-housing, Permanent Supportive Housing and other permanent housing opportunities to transition people quickly into housing units. These resources provide entry cost assistance and ongoing rental assistance. There are numerous housing programs in the CoC that provide varying levels of support services to assist households to maintain their housing and avoid reentering homelessness. This is done through connection to natural supports, connection to neighborhood resources, and accessing employment and mainstream resources.

The Community Development Authority was awarded 10 Stability Vouchers to pair with a Rapid Rehousing program that was funded through the Special NOFO to address Unsheltered Homelessness. Households with experiences of unsheltered homelessness are prioritized for these vouchers.

In looking at System Performance Measures, the CoC has seen changes that are related to challenges in the housing market and availability of resources. Since last fiscal year, the number of people becoming homeless for the first time has remained steady. Increase in income for adult stayers and leavers did not change much from last fiscal year. There was a small increase in the number of adult stayers who increased earned income. There is an increase in the amount of time people experience homelessness. When households exit to permanent housing, about 13% of them are returning to homelessness after two years, which is a decrease from last fiscal year. Successful exits saw a slight decrease. The CoC continues to work on ways to prevent returns to homelessness and increase exits to permanent housing. When households enter permanent housing, we see that 92% of them either maintain that housing or move to other permanent housing.

If a housing situation is not working for a household, the agencies within the CoC work together with the household to identify housing opportunities that might work better. The community recognizes that ending homelessness is the responsibility of all agencies. Relationship building among agency staff will assist in collaboration and coordination of services.

Actions taken to address the needs of public housing.

The Community Development Division (CDD) and the City's Community Development Authority (CDA) continued their successful collaboration on initiatives aimed at both increasing the number and improving the quality of affordable housing units available in the City of Madison. In 2025, efforts remained focused on five ongoing initiatives:

1. Reinforcing neighborhood revitalization goals through strategic use of place-based housing choice vouchers.
2. Aligning both place-based vouchers and public housing residency with employment and training as well as other services to support increased self-sufficiency.
3. Combining resources to create housing opportunities for the City's most vulnerable citizens, particularly the chronically homeless.
4. Combining resources, aimed at rehabilitating and modernizing existing PHA units to provide quality, safe and healthy homes for households.
5. Creating homeownership opportunities for individuals with housing choice vouchers in collaboration with community partners who provide needed supportive resources.
6. Recent collaborations include the City's annual allocation of \$2 million from the Affordable Housing Fund in 2025 to support the rehabilitation, modernization, and preservation of 32 former Public Housing units from the CDA, now owned and managed by the Madison Revitalization and Community Development Corporation (MRCDC) and 11 existing PHA units owned by the CDA. The City also provided an additional \$2 million to help finance the demolition of four dwelling units and the construction of six new townhomes at Theresa Terrace. Furthermore, the City committed up to \$4.8 million in HOME funds and \$5.2 million in Federal Emergency Rental Assistance Program funds to support Phase 1 of the Triangle public housing redevelopment, which involves demolishing and replacing 163 units without displacing current residents. MRCDC, established in 1998, is a separate legal entity created to invest in, manage, and dispose of property to support community redevelopment, though it operates under the management of the Community Development Authority (CDA).

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

In 2025, CDD and CDA continued to collaborate on programs and services supporting households' access to homeownership opportunities and exploring new opportunities. The CDA's Mosaic Ridge Project, designed to assist first-time homebuyers at a variety of income levels with purchase of single-family homes as part of the Allied Neighborhood re-development plan, is one such example. CDD partners with CDA to support individuals with Housing Choice Vouchers convert from renter to owner, including providing down payment assistance subsidies. CDA currently assists 38 households with their mortgage payments, almost all of whom received down payment assistance through CDD.

Actions taken to provide assistance to troubled PHAs.

Existing PHA operations are strong and required no assistance during the program year.

Actions taken 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. 91.220 (j); 91.320 (i)

In 2017, the City began to administer an ordinance to provide a waiver to the Park Impact Fee for affordable housing development projects, requiring land use restriction agreements to ensure long-term housing affordability. This change removed this cost-barrier to the development of affordable housing.

The City also continued its commitment to the Affordable Housing Fund (AHF), a financing tool first created in the 2014 City budget. The AHF was designed to strategically commit City funds in successfully leveraging federal Low-Income Housing Tax Credits (LIHTCs) for affordable rental housing projects. The City's AHF originally set a goal to add 200 of rental units each year, for a five-year period. The City has exceeded that goal, adding 2,398 units at-or-under 60% AMI over the eleven-year program period, for total unit creation of 2,938. Additional funds have been committed in the capital budget to build on the success of the initiative, and represent approximately \$14.5 million in City funding alone for the 2025 capital budget.

In addition to successfully leveraging LIHTC benefits, the City continues to work with eligible projects to access additional gap financing through Tax Incremental Financing (TIF), leveraging additional financial support for affordable housing development. In 2020, the City released a Request for Proposals (RFP) for Affordable Housing Funds to entertain smaller and "missing middle" housing developments from developers not seeking federal LIHTCs. This RFP was re-released in 2022 and 2024, and a third consecutive award cycle is planned for 2026. While the first commitment of Affordable Housing Funds for a non-tax credit project was made in 2019, these projects are now awarded through a regular, competitive process to support smaller-scale development.

In addition to the above, over the past four years, the City of Madison has directly addressed regulatory barriers to affordable housing, including:

- Removal of the "protest petition", which had previously allowed small groups of adjacent property owners to require a super-majority vote of the City's governing body for rezoning of any parcel.
- An in-progress zoning ordinance revision to allow mixed-use developments by right in purely residential districts, so long as both uses in a mixed-use building are otherwise permitted.
- Adjusting thresholds between conditional and permitted uses in all mixed-use and multifamily zoning districts, increasing allowable heights and unit counts by-right, especially benefiting missing-middle development types.
- Creating a new "mission camp" zoning district, allowing by-right housing for individual shelter structures (portable housing) within the City that provide increased housing options for persons experiencing homelessness.
- Creating a new "tiny house village" zoning district, which allows tiny house villages and Conestoga-style homes as a permitted use. These villages were previously heavily scrutinized through a Planned Development process and provide higher-density infill living options for persons exiting homelessness.
- Allowing accessory dwelling units (ADUs) to be permitted by right on any residentially zoned parcel with up to 8 units of housing.
- Proactively upzoning parcels within the Oscar Mayer and Odana Area plans, removing the barrier of rezoning from redevelopment of these well-connected sites. Through these proactive rezonings, up to 4,000 new housing units could potentially be built by right.
- Implementing a new "Area Planning Framework," which comprehensively covers the entire City over a 10-year period. This new framework carefully assesses changes to Future Land Use categories (and what types of development are possible on particular parcels). Proactive rezoning has become a regular component of the Area Plan Framework, and areas ready for proactive rezoning are identified directly within the planning process.
- Implemented a Bus Rapid Transit Overlay zoning district, which could significantly increase allowable heights as a permitted use in areas within a quarter mile of the City's East-West BRT line (which opened in 2024), and any other transit line with at least 15-minute service.
- Updating the "family" definition in the zoning code to create equality between renters and owners regarding the number of people legally allowed to occupy single-family homes, removing discriminatory barriers that could lead to enforcement actions against renters with multiple roommates.

- A zoning code update that allows for additional stories in downtown residential development so land as 50% of the additional square footage created through additional stories is income- and rent-restricted affordable housing. This zoning code overlay is being considered for expansion, where strict height limits are not in place.
- The City's Housing Strategy Committee provided a report to the Common Council on impediments to increased housing production, especially focused on increasing affordable housing activity. This report detailed other strategies that the City will pursue to continue to address housing needs.
- Zoning text amendments that make renovations and accommodations easier on existing homes, allowing residents more flexibility to make minor improvements to their properties.
- Creation of a Housing Policy Committee to oversee housing needs and strategies to facilitate increased housing production
- Creation of a Housing Tracker that analyzes housing needs and production to better communicate community needs and impact of strategies to reduce regulatory barriers
- Zoning changes to allow duplexes, or twin homes, in all residentially zoned areas
- Zoning changes to allow property owners with deep residential lots to split those lots, creating “backyard lots”
- Simplifying the permit process for small and medium sized developments in the downtown area
- Zoning changes to increase the maximum allowed heights in height transition areas
- Zoning changes to allow two Accessory Dwelling Units in a detached building, and simplifying regulatory rules around accessory structures
- Zoning district changes to adjust lot area, lot width, and alley attached garage rear setback minimums
- Adjusting the City's Transit-Oriented Development overlay zoning district to encourage more housing development and fewer auto-centric uses
- Zoning changes that facilitate and allow the creation of Cottage Court-style developments

Actions taken to address obstacles to meeting underserved needs.

91.220(k); 91.320(j)

During 2025, the City of Madison's Community Development Division (CDD) undertook a variety of actions to address obstacles to meeting the needs of underserved persons and households. The Division partnered with area nonprofits, businesses, funders, the Homeless Services Consortium, and the Madison Metropolitan School District to identify community needs, refine priorities, and discuss ways to eliminate barriers to addressing identified needs.

CDD staff continued its use of the City's Neighborhood Indicators program as part of its community development research, strategy development and implementation efforts, and uses this data to inform its Site & Neighborhood Standards at a granular level. With ten years of information to draw from, the data from Neighborhood Indicators has been instrumental in identifying where the Division can best target its resources.

In 2025, CDD staff continued to serve on various committees throughout the Madison area as part of a broad effort to develop strategies to address the needs of local underserved populations. Examples of such groups and committees include the Homeless Services Consortium, the Allied Task Force, Food Policy Committee, Regional Housing Strategy, and the Home Buyers Round Table.

CDD staff continued work with members of the City's Planning and Building Inspection Divisions, as well as with members from the City's Community Development Authority to hold a staff committee designed to implement strategies and define metrics called out in the City's various housing reports.

Actions taken to reduce lead-based paint hazards.

91.220(k); 91.320(j)

The City continued to implement lead paint hazard control activities into its HUD-funded activities. The City-County Public Health Department and City Building Inspection Division continued to coordinate implementation of a local ordinance designed to reduce lead paint removal and dust hazards to neighbors. The City notifies all homeowners with identified lead paint deficiencies

of the availability of low-interest installment loans and deferred payment loans for rehabilitation (available to LMI households) to assist in remediation.

The CDD continued to enforce regulations on lead paint hazards, and the City encountered no difficulties in complying with these regulations. The Division requires a lead hazard inspection for all CDD-assisted residential properties built before 1978. These inspections were scheduled and paid for by the CDD.

Actions taken to reduce the number of poverty-level families.

91.220(k); 91.320(j)

Activities administered by the Community Development Division (CDD) concentrate on initiatives designed to improve the quality of life and expand access and opportunities to the City's residents in greatest need of housing and services. Specifically, the CDD works to expand decent and affordable housing opportunities, create strong and vibrant neighborhoods, and expand economic opportunities for low- and moderate-income individuals throughout the community.

The Division continued to implement three major strategies to help reduce poverty within the City of Madison. These include:

- **Access to information**
Marketing information about available resources to poverty-level households;
- **Resource coordination**
Ensuring that CDD-funded housing assistance programs are proactively linked to other resources needed by people living in poverty; and,
- **City resources**
Improving the City of Madison's CDD-based resource delivery systems to be more responsive to people living in poverty.

In 2025, the CDD continued its intensive review of all funding priorities and strategies in the Division. The goal of this process, known as Results Madison, is to ensure CDD is held accountable for performance-based budgeting and provides baseline data measures for the City. Once baseline data measures are established, CDD will be able to track the effectiveness of funding from various sources and how the impact of these funds can reduce the number of poverty-level families. The Results Madison process has helped to inform how the entire Division prioritizes its budgeting. There is now more clarity regarding what the Division funds, and the City and federally funded funding objectives are clearly represented under one of nine Division goals.

Actions taken to develop institutional structure.

91.220(k); 91.320(j)

During 2025, the CDD continued to refine and revise its programs, create efficiencies, and improve service delivery. A major undertaking in 2020-21 was the continuation of greater coordination between the Community Development Division and Economic Development Division, which has allowed the CDD to better capitalize on staff expertise when reviewing applications for financial assistance through the AHF. Furthermore, the CDD also continued to enhance its coordination with the City's Planning Division. The Planning Division includes CDD staff in preliminary land use application discussions with applicants contemplating affordable housing, enhancing work product and improving efficiencies. As mentioned above, the CDD also took the lead in coordinating an interagency housing staff team that identifies and implements strategies identified in various housing reports, including the 2019 and 2025 editions of the *Analysis of Impediments*.

On a broader City level, CDD staff continued to play an active (and often leading) role in inter-departmental teams comprised of City staff from departments that play a key role in City neighborhoods with high levels of poverty. Among the key City partners are the Building Inspection Division, the Police and Fire Departments, as well as the Housing & Community Investments (HCI) and Community Resources units within the CDD.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

In addition to its 2025 organizational initiatives, the CDD worked with its community partners to plan, develop, and invest in proven and innovative projects that contributed to the priorities and objectives established by the CDBG Committee, Mayor, Common Council, and city residents.

The Division continued its collaborative efforts with other local funders to overcome gaps in institutional structures and enhance coordination of community development efforts. Among the local funders with whom CDD staff worked were WHEDA, United Way, the Dane Workforce Housing Fund, and Dane County Human Services. The City has held new events to deepen connections between service and housing providers, reimagining and reinstituting annual in-person networking events that were held prior to the onset of the COVID-19 pandemic. The structure of these networking events remains designed to connect developers with supportive service providers. In addition, Division staff continued working with local coalitions, including the Homeless Services Consortium, Third Sector Housing, neighborhood center executive directors, and the Home Buyers Round Table.

The CDD continued its strong collaboration with community organizations to enhance and expand efforts to address homeless issues. In 2025, these efforts included acting as applicant, contract administrator and fiscal agent for State EHH funds (Emergency Solutions Grant, Housing Assistance Program, and Homelessness Prevention Program) on behalf of the local consortium of homeless prevention agencies. The CDD also served formally as collaborative applicant for the Madison/Dane County Homeless Assistance Program and is the lead agency for the Youth Homelessness Demonstration Program (YHDP), a process that involves extensive coordination with community organizations. In addition, CDD staff provided necessary environmental reviews for local agencies receiving Continuum of Care contracts for rental assistance directly from HUD.

The City's Community Development and Planning Divisions have now annually published the collaborative Housing Snapshot report to establish reliable metrics against which to measure the City's progress in overcoming barriers and impediments identified in the AI. The housing report identifies supply and demand issues in both the market and affordable housing sectors, the primary challenges affecting the overall housing market, and highlights the impact of local initiatives on housing within the City. The report will continue to be updated annually to illustrate market trends and demographic shifts and provides a resource that all City agencies and staff can rely on for consistent data related to housing. New data is continually added as considerations regarding in which ways the City can better inform community and deeper connections to overcoming impediments.

Identify actions taken to overcome the effects of any impediments identified in the jurisdiction's analysis of impediments to fair housing choice. 91.520(a)

In 2024, the City continued to work with its public and private community partners to fund and implement a wide range of In 2025, the City continued to work with its public and private community partners to fund and implement a wide range of affordable housing development projects, downpayment assistance programs, homebuyer education and financial literacy programs, and housing education and enforcement programs. The City's efforts to address impediments focused principally on actions to increase the supply of rental housing, increase the number of affordable housing options within the City, and mitigate spatial impediments.

More specifically, the City took the following steps in 2025 to address the five categories of impediments to fair housing identified in the 2019 AI:

(1) Actions to Address Supply Impediments

- Worked with developers to move forward projects awarded both City Affordable Housing Funds and WHEDA Low-Income Housing Tax Credits (LIHTCs). These projects will increase the supply of rental housing stock in Madison. Each project contains a set number of units, generally 85% of total units that are income- and rent-restricted for affordability.
- Continued to offer a point scoring preference for funding requests that include affordable housing units with a greater number of bedrooms.
- Instituted Tenant Selection and Screening Criteria standards that remove barriers to accessing housing for those who would otherwise be good tenants, expanding the supply available to residents with previous barriers to accessing housing opportunities.

(2) Actions to Alleviate Affordability Impediments

- Worked with and staffed the City's Housing Policy Committee, to evaluate the impact of the housing market as part of the City's annual Housing Snapshot report.
- Increased the minimum period of affordability for City Affordable Housing Funds to 40 years to promote longer-term affordability and created financial programs within the AHF to incentivize permanent periods of affordability, which have no end term.

(3) Actions to Alleviate Financial Impediments

- Provided funding for homebuyer education with specific marketing to low-income households.
- Continued to provide downpayment assistance to low- and moderate-income homebuyers.
- Supported post-purchase education to improve the ownership experience through participation in the Home Buyers Roundtable.

(4) Actions to Alleviate Spatial Impediments

- Addressed and resisted neighborhood opposition to affordable housing through the active participation of City staff in neighborhood meetings, Plan Commission meetings, and Common Council meetings.
- Collaborated with staff of the Community Development Authority, Economic Development Division, Planning Division, Building Inspection Division, and WHEDA to prioritize new units, neighborhoods that are well located with key amenities, and without concentrations of low-income households.
- Collaborated with staff of the Economic Development and Planning Divisions on the City's forthcoming AI and annual Housing Snapshot reports.
- Prioritized for City Affordable Housing funding projects that are located along major transit corridors.
- Continued to enhance our Affordable Housing Targeted Areas map to ensure that funding for additional income-restricted units met one of two criteria: (1) does not further concentrate low-income households in areas with higher rates of poverty or concentrations of existing subsidized housing units, or (2) provides long-term affordable housing opportunities in areas that have been subject to rapid housing cost increases.

(5) Actions to Alleviate Administrative Impediments

- Staffed an interagency staff team to foster increased collaboration and coordination around affordable housing among City departments and divisions.

Analysis of Impediments to Fair Housing Choice

(1) Race & Ethnicity Impediments

- Moderate to high racial segregation in areas of the City may indicate barriers to geographic housing choice by race/ethnicity.
- Lack of affordably priced units with 3+ bedrooms in specific neighborhoods, especially in neighborhoods with larger Populations of Color.
- Segregation by race/ethnicity within ELI/VLI households shows potential housing discrimination or other barriers for equal access.
- Disproportionately higher levels of eviction in neighborhoods with higher populations of Persons of Color disproportionately impact future housing choice.
- Black/African American individuals and families enter homelessness at a greater rate than other households in the same economic condition, indicating greater levels of housing instability.
- Lack of access/opportunity for economic mobility in areas that are concentrations of Households of Color, and/or poverty directly impede affordable housing opportunity for Households of Color.
- Increasing owner-occupied sales prices in areas that are already moderate- to high-income can exclude lower-income households that are disproportionately Households of Color.
- Extreme disparities in rates of incarceration by race/ethnicity directly impede future housing opportunity, furthering wage gaps and segregation in the City.

(2) Age Impediments

- Lack of assisted housing options for current and future aging populations.
- Lack of enough units within neighborhood interiors for current and future aging populations to downsize.

Analysis of Impediments to Fair Housing Choice, continued

(3) Disability Impediments

- Black/African American households have greater need for accessible units.
- Lack of accessible units/units with services to accommodate increase in current and future aging populations, especially those with disabilities.
- Lack of affordable accessible units disproportionately affects low-income populations, who are more likely to have a household member with a disability.

(4) Income/Affordability Impediments

- Continued lack of supply of lower-rent units creates persistent affordability mismatch and high levels of cost-burden for lower-income households.
- Lack of affordable units disproportionately affect Households of Color, who have a disproportionately higher need for lower-rent units due to cost burden and income disparities.
- Lack of mixed-income neighborhood housing options may perpetuate economic and racial segregation.
- Low labor force participation in some lower-income Census Tracts that display high access to employment opportunities demonstrates a skills mismatch among employers and the potential employees that they are located near.
- Owner-occupied home prices rising faster than incomes in the City, creating a growing income barrier to homeownership.
- Lack of owner-occupied housing stock affordable to low- and very-low income households may perpetuate economic and racial segregation.
- Lack of supply of rental units priced affordably for moderate- to high-income households may “squeeze” the housing market.

(5) Housing Stock Impediments

- Lack of new construction of affordable homeownership options, coupled with decline in single-family attached and condo construction activity, may lead to increased cost of ownership - disproportionately affecting lower-income households.
- Little to no rental housing available in specific neighborhoods limits housing choice and opportunity, and lack of supply of units disproportionately impacts lower-income households.
- Areas with few “missing middle” housing types, especially areas mostly consisting of single-family detached homes, exclude groups more likely to be renters rather than homeowners, and limit options to age-in-place.
- Lack of affordable owner-occupied and rental housing stock in West Madison creates geographic segregation.
- Lack of affordable rental housing in moderate- to high-income areas may perpetuate economic and racial segregation.

(6) Lending Impediments

- Pronounced disparity in lending patterns by race/ethnicity, even for high-income Households of Color.

As required, the CDD also continued its partnership with the Fair Housing Center of Greater Madison, ensuring fair housing testing and enforcement services, as well as training sessions to educate private property owners and managers about fair housing laws and best practices for tenant screening and management.

The CDD completed its *Analysis of Impediments to Fair Housing Choice* report (AI) toward the end of 2025, and this report will be used going forward to track the City's progress toward alleviating identified impediments to fair housing choice for all residents. The CDD analyzed updated fair housing data to inform the recommendations for the updated AI, and has accepted a new 2025 *Analysis of Impediments* written to support development of the *2025-2029 Consolidated Plan*.

The full version of the most recently adopted AI study is available online at <https://www.cityofmadison.com/dpced/community-development/reports>

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

Contracted agencies were required to submit regular monthly or quarterly program activity, financial, and contract compliance reports. This information was used to monitor program activity and contract compliance with all regulations, including administrative, financial, and programmatic operations. Timely expenditure of funds was a component of these monitoring activities. In addition, the reported accomplishment data was used to determine trends, re-evaluate scopes of services, and provide assistance to agencies in addressing barriers to meeting their goals. Staff conducted desk reviews of Annual Rent Reports and provided technical assistance on an array of issues typical of HOME-assisted rental projects. These included when and how to "float" units, ensuring proper documentation of income, ensuring rents were below rent limits including utility allowances, ensuring appropriate lease language, and advising on ongoing compliance for projects with multiple sources of funding (e.g., HOME & LIHTC, HOME & Section 811, etc.). Staff found very few issues to follow up on during the desk reviews.

The Community Development Manager oversaw a risk assessment system for all projects under contract. Each contract manager completed and submitted risk assessment forms that were subsequently reviewed by the CD Manager to identify any high-risk projects. Those were submitted to Baker Tilly for the City's Single Audit review.

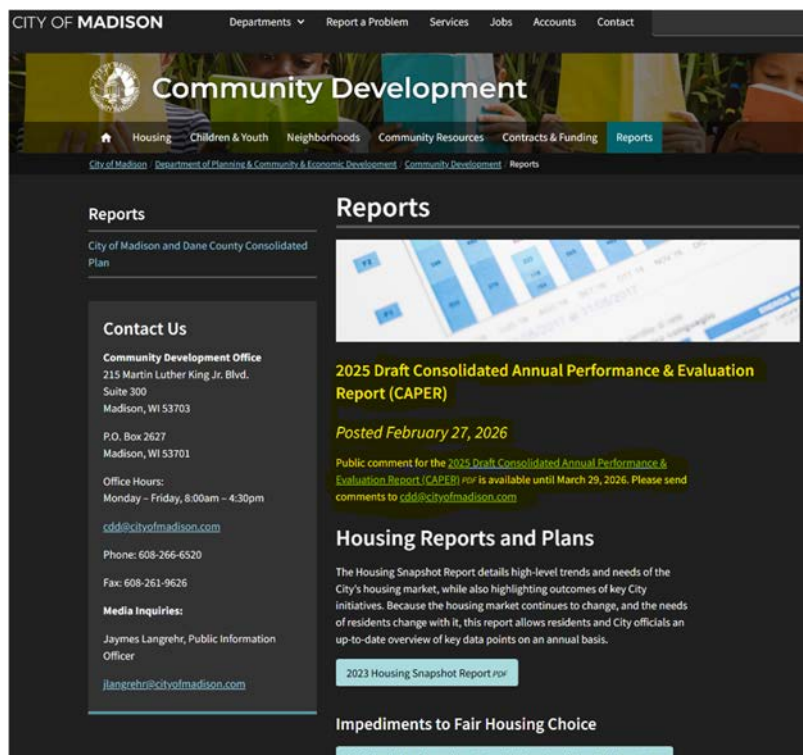
The CDD continued to monitor project progress through reimbursement requests and periodic discussions with subrecipient contract managers, and when appropriate, provided technical assistance to ensure compliance with HUD and other funding requirements.

The Community Development Manager routinely receives and reviews IDIS reports such as the PR02 (Activity Report), to ensure the City's compliance with HUD requirements regarding the timeliness of grant disbursements.

Citizen Participation Plan

91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.



The City of Madison's draft CAPER was posted on the City's website on February 27, 2026, along with instructions for how to provide input on the document. In addition, options to provide public comment on the report were offered at the 3/5/2026 CDBG Committee meeting. This meeting was publicly noticed on the City's Legistar system and posted in public spaces within Madison's City-County Building.

Public comment was accepted for 30 days, through March 29, 2026. No public comment was received during this period.

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of Madison CDD made no significant changes to its program objectives from its adopted 2025 Action Plan. A review of the year's accomplishments and ongoing community needs has led to a decision to continue in 2026 to focus on the development of new units of affordable housing and permanent supportive housing; place emphasis on homelessness prevention, diversion, street outreach, shelter, and case management; and continue to provide small business assistance through technical assistance to micro-enterprises and support to small businesses expanding to create more jobs.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No.

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations.

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR 92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

To ensure compliance with the City of Madison Minimum Housing Codes for rental properties, a sample of HOME-assisted rental units is inspected every three years in accordance with 24 CFR 92.504(d). For rental projects that were completed during the program year, 100% of the units were inspected before initial occupancy and then again within one year of completion.

For 2025 inspections, CDD enacted a Memorandum of Agreement with the City of Madison's Building Inspection (BI) Division. BI inspected 54 (or 21%) of the HOME (and NSP) rental units in the City's portfolio that are within their current period of affordability. (The City has a total of 640 HOME and NSP rental units, including 250 that are outside the period of affordability, and thus do not require inspections.) Results of the inspections were routine, with no major compliance concerns noted. Included among the findings were items such as malfunctioning stovetop burners, damaged bathroom ventilation fans, broken light switches and outlets, loose door and cabinetry hinges, peeling paint on the walls and ceilings, and missing or malfunctioning smoke or CO detectors. Twenty-six of the 54 of the units inspected were fully in compliance with both Housing Quality Standards and City of Madison Minimum Housing Codes and required no re-inspections.

The following table lists all the units that were inspected for 2025. Of the 54 units scheduled for inspection, 28 (51%) required re-inspection, all of which are complete.

HOME Units Inspected During 2025

Agency/Owner	Project	# of Units Inspected
Common Wealth Development	CWD 5817 Balsam Rd RA/Rehab	4
Common Wealth Development	CWD 5801 Raymond Rd RA/Rehab	4
Common Wealth Development	CWD 2102 Leland Drive/5805 Balsam Road	2
Common Wealth Development	CWD The Alliance at Meadowood	3
Housing Initiatives, Inc.	Carling Dr (RA 2010)	4
Housing Initiatives, Inc.	Allied Dr (NSP RA)	3
Housing Initiatives, Inc.	HI Troy Dr (RA 2013)	4
Housing Initiatives, Inc.	HI Mifflin/Butler Acquisition	3
Madison Development Corporation	MDC The Graaskamp	3
Movin' Out, Inc.	North Lawn (RA 2007)	2

Agency/Owner	Project	# of Units Inspected
Movin' Out, Inc.	Marcy Rd Rental Acquisition	2
Movin' Out, Inc.	MO Troy Dr Land Acquisition	1
Porchlight, Inc.	Safe Haven Relocation	7
Porchlight, Inc.	CDA Truax Park Phase 2 PSH	2
Stone House Development	Pinney Apartments	3
Stone House Development	The Royal Apartments	3
The Road Home	Housing & Hope Phase II	4

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

91.520(e); 92.351(a)

The City of Madison's HOME written agreement requires agencies to submit an Affirmative Marketing Plan for developments containing five or more HOME-assisted units and obtain approval from CDD prior to marketing or leasing any HOME-assisted unit(s). CDD staff monitored the implementation of this requirement as part of a rental development project checklist. CDD staff also manages a comprehensive long-term compliance program for HOME-assisted rental housing projects, which includes monitoring ongoing affirmative marketing efforts as part of annual on-site and desk reviews. During annual desk reviews, agencies are required to provide evidence to support that the agency followed its Affirmative Marketing Plan in the form of advertisements, email lists, flyers, etc. During annual on-site reviews, agencies are also required to submit a demographic summary of assisted units to demonstrate adequate results of affirmative marketing efforts.

As part of its efforts to affirmatively market rental opportunities, homeownership assistance and homebuyer education, CDD maintains literature on available programs in English, Spanish, and Hmong. Staff work with area HUD-approved counseling agencies to coordinate and support financial education programs. Information on these classes and programs are marketed through various sources, such as social media, newspaper ads and newsletters, and through continuous efforts from staff to contribute to community-based organizations committed to assisting LMI households to obtain housing and associated education.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.

HOME Program Income Expenditures by Project

Agency	Project #	Project Name	HOME PI Funds	Income Level	Household Size	Race
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 113 La Mariposa Ln # 103	\$90,000.00	0-30% AMI	5	Black/African American
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 113 La Mariposa Ln # 104	\$90,000.00	0-30% AMI	1	Asian
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 719 Regent St	\$90,000.00	0-30% AMI	6	Black/African American
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 731 Regent St # 1	\$90,000.00	0-30% AMI	1	Asian
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 720 W Washington Ave # 101	\$90,000.00	0-30% AMI	5	Asian
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 720 W Washington Ave # 212	\$90,000.00	0-30% AMI	1	Asian/Hispanic
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 720 W Washington Ave # 311	\$90,000.00	0-30% AMI	1	Other multi-racial/ Hispanic
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 720 W Washington Ave # 412	\$90,000.00	0-30% AMI	1	Asian
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 750 W Washington Ave # 2	\$90,000.00	0-30% AMI	4	Black/African American
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 750 W Washington Ave # 4	\$90,000.00	0-30% AMI	2	Asian

Agency	Project #	Project Name	HOME PI Funds	Income Level	Household Size	Race
Bayview Housing Partners, LLC	DR028.19	Bayview Rental Housing Development: 760 W Washington Ave # 3	\$90,000.00	0-30% AMI	1	Asian
City CDD	AA623.22	Deferred Payment Loan: 430 East Bluff	\$4,400.00	30-50% AMI	1	White
City CDD	AA630.22	Deferred Payment Loan: 3905 Goodland Ave	\$24,721.40	30-50% AMI	1	White
City CDD	AA638.22	Deferred Payment Loan: 502 Algoma St	\$20,298.60	50-60% AMI	1	Black/African American/Hispanic
City CDD	AA650.22	Deferred Payment Loan: 1214 Blaine Dr	\$20,116.79	60-80% AMI	1	Other multi-racial
City CDD	BB904.25	HBAD: 5353 Garden View Ct	\$35,450.00	50-60% AMI	1	White
City CDD	BB905.25	HBAD: 6 Heritage Cir # 4	\$35,450.00	50-60% AMI	2	White/Hispanic
City CDD	BB906.25	HBAD: 2937 Turbot Dr	\$35,135.00	60-80% AMI	1	White
City CDD	BB907.25	HBAD: 1626 Kings Mill Way # 206	\$35,135.00	60-80% AMI	1	Black/African American
City CDD	BB911.25	HBAD: 83 Golf Pkwy # F	\$35,135.00	60-80% AMI	1	White
City CDD	BB913.25	HBAD: 942 Acewood Blvd	\$35,450.00	60-80% AMI	1	White
City CDD	BB916.25	HBAD: 1013 N Sunnyvale Ln # G	\$35,135.00	60-80% AMI	1	White/Hispanic
City CDD	BB919.25	HBAD: 5174 Great Gray Dr	\$35,000.00	30-50% AMI	4	Black/African American
City CDD	BB921.25	HBAD: 902 Kottke Dr # 2	\$35,135.00	50-60% AMI	2	White/Hispanic
City CDD	BB927.25	HBAD: 535 D'Onofrio Dr # 2	\$35,135.00	30-50% AMI	1	White
City CDD	BB928.25	HBAD: 2502 Independence Ln # 102	\$35,450.00	60-80% AMI	1	White/Hispanic
City CDD	BB932.25	HBAD: 6941 Chester Dr # C	\$35,135.00	60-80% AMI	3	Black/African American
City CDD	BB936.25	HBAD: 2422 Independence Ln # 206	\$35,450.00	60-80% AMI	1	Black/African American
City CDD	BB938.25	HBAD: 6726 Park Ridge Dr # C	\$35,135.00	50-60% AMI	2	Black/African American
City CDD	BB939.25	HBAD: 5221 Odana Rd	\$35,450.00	60-80% AMI	3	Other multi-racial/Hispanic
City CDD	BB940.25	HBAD: 8206 Starr Grass Dr # 202	\$35,135.00	30-50% AMI	1	White
City CDD	BB941.25	HBAD: 2421 Dunns Marsh Ter	\$35,000.00	60-80% AMI	4	American Indian/Alaskan Native
City CDD	BB942.25	HBAD: 4332 Melody Ln # 210	\$35,450.00	60-80% AMI	2	Black/African American
City CDD	BB944.25	HBAD: 507 Bowman Ave	\$35,450.00	60-80% AMI	2	Black/African American
City CDD	BB945.25	HBAD: 2 Captains Ct # 5	\$35,135.00	50-60% AMI	1	White
City CDD	BB947.25	HBAD: 5309 Brody Dr # 101	\$35,135.00	60-80% AMI	1	Asian
City CDD	BB954.25	HBAD: 2977 Holborn Cir	\$35,135.00	60-80% AMI	1	White/Hispanic
City CDD	BB955.25	HBAD: 917 Vernon Ave	\$35,135.00	60-80% AMI	1	White

Agency	Project #	Project Name	HOME PI Funds	Income Level	Household Size	Race
City CDD	BB956.25	HBAD: 2706 Warner St	\$35,585.00	50-60% AMI	4	White/Hispanic
City CDD	BB958.25	HBAD: 1629 Kings Mill Way # 312	\$35,135.00	50-60% AMI	1	Other multi-racial/ Hispanic
City CDD	BB959.25	HBAD: 1037 S Sunnyvale Ln # E	\$35,135.00	50-60% AMI	1	White/Hispanic
City CDD	BB960.25	HBAD: 1626 Kings Mill Way # 310	\$35,135.00	50-60% AMI	1	White
Movin' Out, Inc.	BK206.25	MO Homeownership: 1010 N Sunnyvale Ln # B	\$45,864.00	50-60% AMI	2	Other multi-racial/ Hispanic
Movin' Out, Inc.	BK207.25	MO Homeownership: 625 E Mifflin St # 204	\$45,864.00	30-50% AMI	1	White

An additional \$192,907 in HOME PI was expended for overall program administration.

Describe other actions taken to foster and maintain affordable housing.

91.220(k)

As detailed in sections CR-05 and CR-15, the City continued to implement its broad scope Affordable Housing Initiative in 2025, working with both non-profit and for-profit developers to maintain and increase the local supply of affordable housing. The effort's primary focus was on securing competitive Low-Income Housing Tax Credits (LIHTCs) by partnering with developers and offering significant City financial support to high quality projects that met identified criteria.

CDD also maintained a homeownership down payment assistance program and a rental housing rehabilitation program in 2025. Each is detailed elsewhere in this report.

CR-58 - Section 3

Total Labor Hours

	CDBG	HOME	ESG
Total Number of Activities	1	1	0
Total Labor Hours	0	101,940	0
Total Section 3 Worker Hours	0	17,971	0
Total Targeted Section 3 Worker Hours	0	1,986	0

Qualitative Efforts – Number of Activities by Program

	CDBG	HOME	ESG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	2	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers	2	1	0
Direct, on-the-job training (including apprenticeships)	2	26	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training	1	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., résumé assistance, coaching)	0	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns	1	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts	1	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns	1	0	0
Provided or connected residents with assistance in seeking employment, including: drafting résumés, preparing for interviews, finding job opportunities, connecting residents to job placement services	0	0	0
Held one or more job fairs	3	0	0
Provided or connected residents with supportive services that can provide direct services or referrals	0	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation	0	0	0
Assisted residents with finding child care	0	0	0
Assisted residents to apply for, or attend community college or a four-year educational institution	0	0	0
Assisted residents to apply for, or attend, vocational/technical training	0	0	0
Assisted residents to obtain financial literacy training and/or coaching	0	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns	0	0	0
Provided or connected residents with training on computer use or online technologies	0	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses	2	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act	0	0	0
Other	1	1	0

Narrative

Other efforts regarding CDBG-funded Section 3 projects: CDD has ongoing partnerships with Madison College, Operation Fresh Start, and the Urban League of Greater Madison to promote youth working in our programs. We also reach out to these organizations when we have job openings, to try to recruit from among their graduates.

ESG Supplement to the CAPER in e-snaps For Paperwork Reduction Act

Recipient Information

All Recipients Complete

Basic Grant Information

Recipient Name MADISON
Organizational UEI Number FS3AZ3FV8JG8
Organizational DUNS Number 07-614-7909
EIN/TIN Number 39-6005507
Identify the Field Office MILWAUKEE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance Madison/Dane County CoC

ESG Contact Name

Linette S. Rhodes
 Community Development Manager
 (608) 261-9240 / lrhodes@cityofmadison.com

ESG Contact Address

215 Martin Luther King, Jr. Boulevard, Suite 300
 PO Box 2627
 Madison WI 53703-2627

ESG Secondary Contact

Sarah Lim
 Community Development Specialist
 (608) 261-9148 / slim@cityofmadison.com

Reporting Period

All Recipients Complete

Program Year Start Date 01/01/2025 **Program Year End Date** 12/31/2025

2024 ESG Subrecipients included:

Organization	Victim Services Provider?	Organization Type	ESG Subgrant or Contract Award
Catalyst for Change, Inc. Madison, WI 53703 UEI: E49HN7YAC943 DUNS: 11-763-7887	No	Other Non-Profit Organization	\$ 17,000
Community Action Coalition for South Central Wisconsin, Inc. Madison, WI 53704 UEI: J9PFRNKYEHZ1 DUNS: 07-893-5681	No	Other Non-Profit Organization	\$ 58,290
Institute for Community Alliances Madison, WI 54703-2731 UEI: FD8JNZNSLPN8 DUNS: 14-934-1732	No	Other Non-Profit Organization	\$ 3,462
The Salvation Army of Dane County Madison, WI 54708-8455 UEI: NDM9CJA8ZSH8 DUNS: 15-077-7253	No	Faith-Based Organization	\$ 60,000
YWCA of Madison, Inc. Madison, WI 53703 UEI: T5DBX42DJHU3 DUNS: 16-850-4199	No	Other Non-Profit Organization	\$ 25,000

Persons Served with ESG

	Total	Homelessness Prevention	Rapid Re-Housing	Shelter	Street Outreach
Adults	1,230	30	0	758	442
Children	412	23	0	320	69
Don't know / refused / other	3	0	0	3	0
Missing information	11	0	0	11	0
Total (unduplicated)	1,656	53	0	1,092	511

Sex

All Activities	Total
Male	136
Female	246
Don't know / refused / other	19
Missing information	1,255
Total (unduplicated)	1,656

Age

Number of Persons in Households	Total
Under 18	412
18 - 24	120
25 and over	1,110
Don't know / refused / other	4
Missing information	10
Total (unduplicated)	1,656

Special Populations Served

Subpopulation	Total	Homelessness Prevention	Rapid Re-Housing	Shelter	Street Outreach
a. Veterans	19	0	0	6	13
b. Victims of domestic violence	454	6	0	304	114
c. Elderly	77	0	0	47	30
d. HIV / AIDS	3	0	0	1	2
e. Chronically homeless	311	n/a	0	166	145
Persons with Disabilities					
f. Severely mentally ill	506	15	0	311	180
g. Chronic substance abuse	218	1	0	101	116
h. Other disability	541	27	0	216	297

Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	78,475
Total Number of bed-nights provided	74,614
Capacity Utilization	95%

Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

The City receives a limited amount of federal ESG funds as an entitlement city and accesses additional ESG funds through the State of Wisconsin's EHH application process. Other local, state, and federal funds also address homeless and prevention goals outlined in the Consolidated Plan and may have had more of a direct impact on meeting established goals. Activities include supporting the operations of emergency shelter, outreach, prevention, and rapid re-housing. Funding for ESG will be considered through goals established in *Dane Forward: A Five-Year Plan to Prevent and End Homelessness* developed by Dane CoC, with support from the City of Madison. Dane CoC's Board of Directors and Core Committee review the HUD system performance measures regularly for the entire CoC. City of Madison staff participate in Core Committee and attend the CoC Board of Directors meetings. As a result of collaboration among various funders, project outcomes for all CoC, ESG, and City GPR funded projects are established and measured consistently. Project outcome data measured for those programs mirror the HUD system performance measures and include length of time persons remain homeless, exit to or retention of permanent housing, return to homelessness, and change in income.

CR-75 – Expenditures

<i>ESG Expenditures for Homelessness Prevention</i>	Dollar Amount of Expenditures in Program Year		
	2023	2024	2025
Expenditures for Rental Assistance	\$ 13,502.21	\$ 15,577.30	\$ 0
Expenditures for Housing Relocation & Stabilization Services - Financial Assistance	6,743.98	4,401.93	0
Expenditures for Housing Relocation & Stabilization Services – Services	5,936.81	12,117.77	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	\$ 26,193	\$ 32,097	\$ 0

<i>ESG Expenditures for Rapid Re-Housing</i>	Dollar Amount of Expenditures in Program Year		
	2023	2024	2025
Expenditures for Rental Assistance	\$ 0	\$ 0	\$ 0
Expenditures for Housing Relocation & Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services – Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	\$ 0	\$ 0	\$ 0

<i>ESG Expenditures for Emergency Shelter</i>	Dollar Amount of Expenditures in Program Year		
	2023	2024	2025
Essential Services	\$ 0	\$ 0	\$ 60,000
Operations	0	0	25,000
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal Emergency Shelter	\$ 0	\$ 0	\$ 85,000

<i>Other Grant Expenditures</i>	Dollar Amount of Expenditures in Program Year		
	2023	2024	2025
Street Outreach	\$ 0	\$ 1,477	\$ 7,268
HMIS	0	0	3,462
Administration	0	0	12,983

<i>Total ESG Funds Expended</i>	2023	2024	2025
\$ 168,480	\$ 26,193	\$ 33,574	\$ 108,713

<i>Other Funds Expended on Eligible ESG Activities</i>	2023	2024	2025
Other Non-ESG HUD Funds	\$ 0	\$ 0	\$ 16,445
Other Federal Funds	26,193	32,097	0
State Government	0	0	0
Local Government	0	1,477	92,268
Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	\$ 26,193	\$ 33,574	\$ 108,713

<i>Total Amount of Funds Expended on ESG Activities</i>	2023	2024	2025
\$ 336,960	\$ 52,386	\$ 67,148	\$ 217,426

HOME Match Report

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

OMB Approval No. 2506-0171
(exp. 09/30/2023)

Part I Participant Identification			Match Contributions for Federal Fiscal Year	2025
1. Participant No. (assigned by HUD) 39-6005507 / Grantee 15062	2. Name of the Participating Jurisdiction CITY OF MADISON		3. Name of Contact (person completing this report) Linette Rhodes	
5. Street Address of the Participating Jurisdiction STE 300 MADISON MUNICIPAL BLDG, 215 MARTIN LUTHER KING JR BLVD / PO BOX 2627			4. Contact's Phone Number (include area code) (608) 261-9240	
6. City MADISON	7. State WISCONSIN	8. Zip Code 53703 / 53701-2627		

Part II Fiscal Year Summary		
1. Excess match from prior Federal fiscal year	\$	12,903,973.06
2. Match contributed during current Federal fiscal year (see Part III.9.)	\$	1,010,000.00
3. Total match available for current Federal fiscal year (line 1 + line 2)		\$ 13,913,973.06
4. Match liability for current Federal fiscal year		\$ 140,777.87
5. Excess match carried over to next Federal fiscal year (line 3 minus line 4)		\$ 13,773,195.19

Part III Match Contribution for the Federal Fiscal Year								
1. Project No. or Other ID	2. Date of Contribution (mm/dd/yyyy)	3. Cash (non-Federal sources)	4. Foregone Taxes, Fees, Charges	5. Appraised Land / Real Property	6. Required Infrastructure	7. Site Preparation, Construction Materials, Donated labor	8. Bond Financing	9. Total Match
Bayview DR028.19	11/25/2024	-	-	-	-	-	990,000.00	\$ 990,000.00
MOI BK207.25	09/30/2025	20,000.00	-	-	-	-	-	\$ 20,000.00
		-	-	-	-	-	-	\$ -
		-	-	-	-	-	-	\$ -
		-	-	-	-	-	-	\$ -
		-	-	-	-	-	-	\$ -
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		-	-	-	-	-	-	\$ -
		-	-	-	-	-	-	\$ -
<i>Total from Page 2</i>		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
FINAL TOTAL		\$ 20,000.00	\$ -	\$ -	\$ -	\$ -	\$ 990,000.00	\$ 1,010,000.00



Submission Overview: ESG: CAPER

Report: CAPER

Period: 1/1/2025 - 12/31/2025

Your user level here: Data Entry and Account Admin

Step 1: Dates

1/1/2025 to 12/31/2025

Step 2: Contact Information

Grant Contact

The Contact Person should be the person that the HUD Field Office or HUD Headquarters should contact regarding your APR submission should there be any questions or issues. The contact person should be familiar with both the project and the APR submission. This is also the person who will receive the email from Sage acknowledging the submission of the APR to the HUD Field Office and of the action taken by the Field Office approval, request to resubmit, comments, etc.

First Name	Sarah
Middle Name	
Last Name	Lim
Suffix	
Title	
Street Address 1	215 Martin Luther King Jr. Blvd.
Street Address 2	
City	Madison
State	Wisconsin
ZIP Code	53703
E-mail Address	slim@cityofmadison.com
Phone Number	(608)261-9148
Extension	
Fax Number	

Additional Contact(s)

Additional contact(s) will receive automatic email notifications from Sage regarding report status changes.

Step 4: Grant Information

Emergency Shelter Rehab/Conversion

Did you create additional shelter beds/units through an ESG-funded rehab project	No
Did you create additional shelter beds/units through an ESG-funded conversion project	No

Data Participation Information

Are there any funded projects, except HMIS or Admin, which are not listed on the Project, Links and Uploads form? This includes projects in the HMIS and from VSP No

Step 5: Project Outcomes

Project outcomes are required for all CAPERS where the program year start date is 1-1-2021 or later. This form replaces the narrative in CR-70 of the eCon Planning Suite.

From the Action Plan that covered ESG for this reporting period copy and paste or retype the information in Question 5 on screen AP-90: "Describe performance standards for evaluating ESG."

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

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

- Agency is on-course to spend 100% of its awarded funds by the end of the contract;
- Agency meets the HMIS data quality standards;
- Agency submits requested reports to the City in a timely manner;
- Agency meets percentage goal for participants who remain or leave for stable housing;
- Agency meets percentage goal for participants who did not enter shelter within 12 months;
- Agency meets percentage goal for participants who maintain housing at six months; and
- Agency meets percentage goal for unsheltered participants who move into housing.

Based on the information from the Action Plan response previously provided to HUD:

1. Briefly describe how you met the performance standards identified in A-90 this program year. *If they are not measurable as written type in N/A as the answer.*

- Funding Utilization: All ESG-funded programs successfully expended 100% of awarded funds within the contract period.
- Data Quality & Reporting: All agencies met HMIS data quality standards and submitted reports to the City on time.
- Performance Outcomes:
 - o Emergency Shelter: Did not meet the exit-to-permanent-housing goal (40% for households without children, 70% for households with children). ESG performance was 36% for households without children and 68% for households with children.
 - o Homelessness Prevention: Did not meet the goal for permanent housing retention or exit (95% or higher). ESG performance was 91%.
 - o Street Outreach: Did not meet the exit-to-positive-destination goal (60% or higher). ESG performance was 7%.

2. Briefly describe what you did not meet and why. *If they are not measurable as written type in N/A as the answer.*

- All three program types fell short of the City of Madison performance goals in 2025. Emergency Shelter and Homelessness Prevention programs came close to their respective targets, while Street Outreach fell significantly below the established benchmark.
- It is worth noting that the City's performance goals are intentionally ambitious. They represent aspirational targets that reflect where the system aims to be, not minimum expectations.
- Several systemic factors contributed to the shortfalls across program types:
- Increased demand. The number of households experiencing homelessness rose considerably in 2025. Street Outreach programs in particular saw a sharp increase in enrollments, driven in part by HMIS workflow requirements that mandate enrollment for all individuals contacted during outreach efforts, including those with incomplete information or limited service engagement. As a result, a significant share of recorded exits reflect unknown destinations rather than verified outcomes, which disproportionately affects this program's performance metrics.
 - Reduced housing availability. The expiration of COVID-19-era housing funding led to fewer openings across the homeless services housing continuum, limiting the ability to transition participants into stable housing.
 - Economic barriers. Rising rents and a persistent shortage of affordable housing options constrained exit opportunities for all program types.
 - Workforce challenges. Staff burnout and high turnover continued to strain capacity across the homeless services sector.

City and County homeless services staff are actively working alongside service providers to address these challenges. Collaborative strategies, including case conferencing and system flow discussions, are underway with the goal of improving service effectiveness and increasing successful housing outcomes in the year ahead.

OR

3. If your standards were not written as measurable, provide a sample of what you will change them to in the future? *If they were measurable and you answered above type in N/A as the answer.*

N/A

Step 6: Financial Information

ESG Information from IDIS

As of 3/27/2026

FY	Grant Number	Current Authorized Amount	Funds Committed By Recipient	Funds Drawn	Balance Remaining	Obligation Date	Expenditure Deadline
2025	E25MCS50005	\$173,107.00	\$0	\$0	\$173,107.00	12/10/2025	12/10/2027
2024	E24MCS50005	\$167,606.00	\$167,606.00	\$139,701.00	\$27,905.00	9/4/2024	9/4/2026
2023	E23MCS50005	\$166,993.00	\$166,993.00	\$166,993.00	\$0	8/1/2023	8/1/2025
2022	E22MCS50005	\$167,409.00	\$167,409.00	\$167,409.00	\$0	8/25/2022	8/25/2024
2021	E21MCS50005	\$168,299.00	\$168,299.00	\$168,299.00	\$0	8/18/2021	8/18/2023
2020	E20MCS50005	\$166,037.00	\$166,037.00	\$166,037.00	\$0	9/16/2020	9/16/2022
2019	E19MCS50005	\$159,201.00	\$159,201.00	\$159,201.00	\$0	7/31/2019	7/31/2021
2018	E18MCS50005	\$154,219.00	\$154,219.00	\$154,219.00	\$0	10/3/2018	10/3/2020
2017	E17MCS50005	\$152,813.00	\$152,813.00	\$152,813.00	\$0	10/19/2017	10/19/2019
2016	E16MCS50005	\$149,702.00	\$149,702.00	\$149,702.00	\$0	8/22/2016	8/22/2018
2015	E15MCS50005	\$152,860.00	\$152,860.00	\$152,860.00	\$0	7/17/2015	7/17/2017
Total		\$2,055,704.00	\$1,882,597.00	\$1,854,692.00	\$201,012.00		

Expenditures	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016
	Yes	Yes	Yes	No	No	No	No	No	No	No
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for							
Homelessness Prevention	Non-COVID	Non-COVID	Non-COVID							
Rental Assistance	0.00	15,577.30	13,502.21							
Relocation and Stabilization Services - Financial Assistance	0.00	4,401.93	6,753.98							
Relocation and Stabilization Services - Services	0.00	12,117.77	5,936.81							
Hazard Pay (unique activity)										
Landlord Incentives (unique activity)										
Volunteer Incentives (unique activity)										
Training (unique activity)										
Homeless Prevention Expenses	0.00	32,097.00	26,193.00							
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for							
Rapid Re-Housing	Non-COVID	Non-COVID	Non-COVID							
Rental Assistance	0.00	0.00	0.00							
Relocation and Stabilization Services - Financial Assistance	0.00	0.00	0.00							
Relocation and Stabilization Services - Services	0.00	0.00	0.00							
Hazard Pay (unique activity)										
Landlord Incentives (unique activity)										
Volunteer Incentives (unique activity)										
Training (unique activity)										
RRH Expenses	0.00	0.00	0.00							
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for							
Emergency Shelter	Non-COVID	Non-COVID	Non-COVID							
Essential Services	60,000.00	0.00	0.00							
Operations	25,000.00	0.00	0.00							
Renovation	0.00	0.00	0.00							
Major Rehab	0.00	0.00	0.00							
Conversion	0.00	0.00	0.00							
Hazard Pay (unique activity)										
Volunteer Incentives (unique activity)										
Training (unique activity)										
Emergency Shelter Expenses	85,000.00	0.00	0.00							
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for							
Temporary Emergency Shelter	Non-COVID	Non-COVID	Non-COVID							

	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for
	Non-COVID	Non-COVID	Non-COVID
Essential Services			
Operations			
Leasing existing real property or temporary structures			
Acquisition			
Renovation			
Hazard Pay (unique activity)			
Volunteer Incentives (unique activity)			
Training (unique activity)			
Other Shelter Costs			
Temporary Emergency Shelter Expenses			
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for
	Non-COVID	Non-COVID	Non-COVID
Street Outreach			
Essential Services	7,268.00	1,477.00	0.00
Hazard Pay (unique activity)	0.00	0.00	0.00
Volunteer Incentives (unique activity)	0.00	0.00	0.00
Training (unique activity)	0.00	0.00	0.00
Handwashing Stations/Portable Bathrooms (unique activity)	0.00	0.00	0.00
Street Outreach Expenses	7,268.00	1,477.00	0.00
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for
	Non-COVID	Non-COVID	Non-COVID
Other ESG Expenditures			
Cell Phones - for persons in CoC/ YHDP funded projects (unique activity)			
Coordinated Entry COVID Enhancements (unique activity)			
Training (unique activity)			
Vaccine Incentives (unique activity)			
HMIS	3,462.00	0.00	0.00
Administration	12,983.00	0.00	0.00
Other Expenses	16,445.00	0.00	0.00
	FY2025 Annual ESG Funds for	FY2024 Annual ESG Funds for	FY2023 Annual ESG Funds for
	Non-COVID	Non-COVID	Non-COVID
Total Expenditures	108,713.00	33,574.00	26,193.00
Match	108,713.00	33,574.00	26,193.00
Total ESG expenditures plus match	217,426.00	67,148.00	52,386.00

Total expenditures plus match for all years

336,960.00

Step 7: Sources of Match

	FY2025	FY2024	FY2023	FY2022	FY2021	FY2020	FY2019	FY2018	FY2017	FY2016	FY2015
Total regular ESG plus COVID expenditures brought forward	\$108,713.00	\$33,574.00	\$26,193.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total ESG used for COVID brought forward	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total ESG used for regular expenses which requires a match	\$108,713.00	\$33,574.00	\$26,193.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Match numbers from financial form	\$108,713.00	\$33,574.00	\$26,193.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Match Percentage	100.00%	100.00%	100.00%	0%	0%	0%	0%	0%	0%	0%	0%

Match Source	FY2025	FY2024	FY2023	FY2022	FY2021	FY2020	FY2019	FY2018	FY2017	FY2016	FY2015
Other Non-ESG HUD Funds	16,445.00										
Other Federal Funds		32,097.00	26,193.00								
State Government											
Local Government	92,268.00	1,477.00									
Private Funds											
Other											
Fees											
Program Income											
Total Cash Match	108,713.00	33,574.00	26,193.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Non Cash Match											
Total Match	108,713.00	33,574.00	26,193.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Step 8: Program Income

Program income is the income received by the recipient or subrecipient directly generated by a grant supported activity. Program income is defined in 2 CFR §200.307. More information is also available in the [ESG CAPER Guidebook](#).

Did the recipient earn program income from any ESG project during the program year?

No

Step 9: Additional Comments

Please provide any additional comments on other areas of the CAPER that need explanations: **Thank you!**



Office of Community Planning and Development
 U.S. Department of Housing and Urban Development
 Integrated Disbursement and Information System
 PR26 - CDBG Financial Summary Report
 Program Year 2025
 MADISON , WI

DATE: 03-26-26
 TIME: 19:42
 PAGE: 1

PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	1,850,653.94
02 ENTITLEMENT GRANT	2,045,072.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	855,784.33
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	107,685.31
08 TOTAL AVAILABLE (SUM, LINES 01-07)	4,859,195.58

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	2,640,659.26
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	(1,119,467.94)
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	1,521,191.32
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	786,961.00
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	(207,045.19)
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	2,101,107.13
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	2,758,088.45

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	570,307.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	2,070,352.26
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	(1,119,467.94)
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	1,521,191.32
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2025 PY: PY:
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	1,521,191.32
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	1,521,191.32
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	100.00%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	333,844.00
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	333,844.00
32 ENTITLEMENT GRANT	2,045,072.00
33 PRIOR YEAR PROGRAM INCOME	2,167,609.75
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	(329,557.23)
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	3,883,124.52
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	8.60%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	786,961.00
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	(207,045.19)
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	579,915.81
42 ENTITLEMENT GRANT	2,045,072.00
43 CURRENT YEAR PROGRAM INCOME	855,784.33
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	107,685.31
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	3,008,541.64
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	19.28%

PR26 - Activity Summary by Selected Grant

Date Generated: 03/26/2026

Grantee: MADISON

Grant Year: 2025

Formula and Competitive Grants only

Total Grant Amount for CDBG 2025 Grant year B25MC550005 Grant Number = \$2,045,072.00															
State	Grantee Name	Grant Year	Grant Number	Activity Group	Matrix Code	National Objective	IDIS Activity	Activity to prevent, prepare for, and respond to Coronavirus	Activity Status	Amount Funded From Selected Grant	Amount Drawn From Selected Grant	% of CDBG Drawn From Selected Grant/Grant	Total CDBG Funded Amount (All Years All Sources)	Total CDBG Drawn Amount (All Years All Sources)	
WI	MADISON	2025	B25MC550005	Administrative And Planning	20		3223	No	Open	\$14,530.00	\$14,530.00		\$41,500.00	\$41,500.00	
WI	MADISON	2025	B25MC550005	Administrative And Planning	21A		3192	No	Open	\$326,300.00	\$326,262.00		\$497,454.00	\$497,416.00	
WI	MADISON	2025	B25MC550005	Administrative And Planning	21D		3224	No	Open	\$41,000.00	\$41,000.00		\$41,000.00	\$41,000.00	
				Total Administrative And Planning							\$381,830.00	\$381,792.00	18.67%	\$579,954.00	\$579,916.00
WI	MADISON	2025	B25MC550005	Public Services	03T	LMC	3220	No	Open	\$33,105.00	\$33,105.00		\$333,844.00	\$333,844.00	
				Non CARES Related Public Services							\$33,105.00	\$33,105.00	1.62%	\$333,844.00	\$333,844.00
				Total 2025							\$414,935.00	\$414,897.00	20.29%	\$913,798.00	\$913,760.00
				Grand Total							\$414,935.00	\$414,897.00	20.29%	\$913,798.00	\$913,760.00

This certification is applicable.
 This certification does not apply.

NON-STATE GRANTEE 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 75.

Signature of Authorized Official:



Satya Rhodes-Conway, Mayor of Madison

03/04/2026

Date

This certification is applicable.
 This certification does not apply.

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 a 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) **2025** [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), 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:



Satya Rhodes-Conway, Mayor of Madison

03/04/2026

Date

- This certification is applicable.
 This certification does not apply.

SPECIFIC HOME CERTIFICATIONS

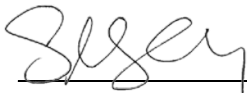
The HOME participating jurisdiction certifies that:

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:



Satya Rhodes-Conway, Mayor of Madison

03/04/2026

Date

<input checked="" type="checkbox"/> This certification is applicable. <input type="checkbox"/> This certification does not apply.
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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.

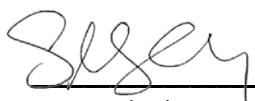
Confidentiality. The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the 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:



Satya Rhodes-Conway, Mayor of Madison

03/04/2026

Date

- | |
|--|
| <input checked="" type="checkbox"/> This certification is applicable.
<input type="checkbox"/> This certification does not apply. |
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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.