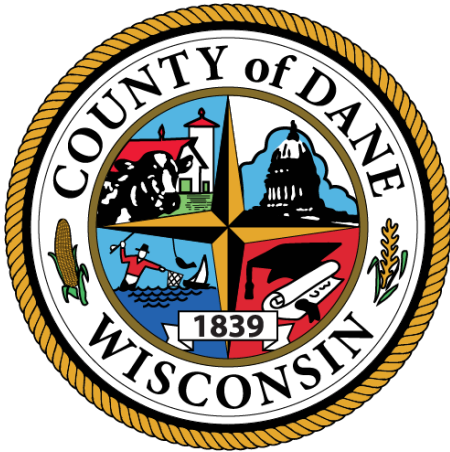


# DANE COUNTY URBAN COUNTY CONSORTIUM

## HOME - American Rescue Program (HOME-ARP) Allocation Plan

County of Dane, Department of Human Services  
Division of Housing Access & Affordability



Community Development Block Grant  
Home Investment Partnerships

**For Submission to the U.S. Department of Housing and Urban Development.**

APPROVED by CDBG Commission: February 27, 2023  
APPROVED by Dane County Board: March 16, 2023 **(Pending Approval)**

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## HOME-ARP Allocation Plan

All sections in this plan, including questions and tables, reflect the requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*. References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Executive Summary

The Dane County Urban County Consortium (“Dane County” also referenced as “County”) will receive funding in the amount of \$2,255,364 under the HOME American Rescue Program (HOME-ARP) from the U.S. Department of Housing and Urban Development (HUD) to help create affordable housing and services for people experiencing or at risk of experiencing homelessness. The funds were appropriated under Title II of the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended (42 U.S.C. 12701 et seq.) (“NAHA”) and the American Rescue Plan Act of 2021.

HOME-ARP is a special allocation of the HOME Investment Partnerships Program (HOME) intended to support activities that assist individuals or households who are homeless, at risk of homelessness and other vulnerable populations (referred to as ‘qualifying populations’), including:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability;
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

Below is a list of four eligible activities that HOME-ARP funds can be used for that were identified by HUD:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling.
- Purchase and Development of Non-Congregate Shelter. These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the Emergency Solutions Grant program; 2) permanent housing under the Continuum of Care; or 3) affordable housing under the HOME program.

This Allocation Plan describes how Dane County will utilize its \$2,555,364 HOME-ARP award to assist Qualifying Populations and includes the following:

- A summary of the consultation process and results of upfront consultation;
- A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
- A description of HOME-ARP qualifying populations within the jurisdiction;
- An assessment of unmet needs of each qualifying population;
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
- A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
- An estimate of the number of housing units for qualifying populations the PJ will produce or preserve with its HOME-ARP allocation; and
- A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.

## Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, Dane County consulted with the following groups:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs), City of Madison PHA and Dane County PHA
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

## Summary of Consultation Process

### ***Describe the consultation process including methods used and dates of consultation:***

Dane County, in partnership with the City of Madison's Community Development Division, consulted and obtained feedback from the required public and private agencies as part of the HOME-ARP allocation plan. On May 27, 2022, an email survey was sent to consult with various agencies focusing on government, service providers, and individuals with lived experience which included all providers identified in Section V.A. of the Notice (page 13). A total of 111 responses were received on June 10<sup>th</sup>, with most responses provided by direct service providers. In addition, on July 14<sup>th</sup>, a total of 26 public and private agencies were invited to participate in a direct focus group. On August 3<sup>rd</sup>, the focus group met with a total of nineteen (19) public and private agencies.

## Organizations Consulted

### ***List the organizations consulted:***

The table below includes feedback provided to Dane County staff. Agencies were consulted in accordance with Notice CPD-21-10. The Dane County staff met with the following stakeholders:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Homeless Services Consortium of Dane County</b>	Continuum of Care serving Jurisdiction	Focus Group Consultation	<p>The CoC discussed that there are not enough units in the community to support the need. There is potential for funding sources to help with rent but not sufficient amount of units available. The participant also urged for adding supportive services to current properties, ideally in an effort to move them to a housing first model.</p> <p>The participant shared that the community needs more engagement among landlords. Their hope was that funds could be used to improve landlord communication.</p>
<b>Porchlight, Inc.</b>	Homeless Service Provider / Agency Serving Veterans	Online Survey	Porchlight is a nonprofit organization that operates an emergency shelter for men, transitional housing for veterans, a day shelter for adults with mental illness, housing-related emergency assistance and operates 350 units of affordable housing across 26 sites. This service provider was invited to the Focus Group

			<p>Consultation but did not participate. In their individual response to the email survey collected on May 31, 2022, a representative of Porchlight indicated a stronger preference for tenant-based rental assistance and new supportive housing. The respondent also indicated that gaps in supportive services existing in the community included access to AODA and mental health services as well as employment counseling. Other unmet needs (other than supportive services) include bus ticket assistance and gas vouchers.</p>
<b>Briarpatch Youth Services, Inc.</b>	Homeless Service Provider	Focus Group Consultation	<p>This service provider agreed that there is a need for more units of housing, especially for singles. Another population that needs housing choice are 17-year olds and those exiting the foster care system. Funding for supportive services is needed, including case management, housing navigation and rental assistance. This provider also shared that housing with access to child care services is a great need in the community.</p>
<b>Mach One Health</b>	Homeless Service Provider	Focus Group Consultation	<p>Mach OneHealth provides street and encampment outreach and offers health screenings through its clinic program. Mach OneHealth also operates the City of Madison’s sheltered campground.</p> <p>This service provider shared that there are so many people to serve and not enough housing units to meet the demand. The community especially needs units managed by property managers or service providers who will reduce barriers for people. As for the population with the greatest need, Mach OneHealth urged that the greatest</p>

			need is for singles households without children. As a homeless service provider, they recognize that there is a substantial group of chronically homeless and those that need significant social services to stay housed.
<b>Middleton Outreach Ministry (MOM)</b>	Homeless Service Provider	Focus Group Consultation	The participant was surprised by the information presented in the meeting showing a higher need for units catering to singles than families. Their organization has a lot of difficulty housing large families, especially families with 3 or more children. The participant also agreed that more funding for supportive services was needed.
<b>The Salvation Army of Dane County</b>	Homeless Service Provider	Focus Group Consultation	No feedback provided.
<b>Lutheran Social Services (LSS)</b>	Homeless Service Provider	Focus Group Consultation	This service provider agreed that there is a need for more units of housing, especially large units for large families. LSS also shared that it is quite difficult to find property managers who will rent to people with barriers.
<b>UNIDOS Wisconsin</b>	Domestic Violence Service Provider	Focus Group Consultation	No feedback provided.
<b>Domestic Abuse Intervention Services (DAIS)</b>	Domestic Violence Service Provider	Focus Group Consultation	The participant agreed that more housing was needed. The biggest challenge for this service provider is in serving large families. DAIS also shared that their case managers are trained to provide trauma informed care and work with clients on health and safety issues, not necessarily housing. There is a need for more case managers and housing navigation. In the end, this participant urged that whoever will run the housing programs funded with this HOME-ARP funding, they need to understand trauma informed care.

<p><b>William S. Middleton Memorial Veterans Hospital – HUD VASH Housing Program</b></p>	<p>Public agency addressing the needs of veterans</p>	<p>Focus Group Consultation</p>	<p>The contributor recognized that money is available to help the supply of affordable housing but there are not enough units to meet needs. As they work with VASH, veterans are generally single and so smaller units are needed. There are not enough units for people under the age of 55 years old. There is also a need for more accessible units and those that meet universal design.</p> <p>For supportive services, they recommended placing support services into existing properties that serve the qualifying population. The contributor also encouraged more case managers at properties. They also encouraged new units of housing to be built near new or existing medical clinics.</p>
<p><b>Community Development Authority (CDA)</b></p>	<p>Public Housing Authority (PHA)</p>	<p>Focus Group Consultation</p>	<p>The CDA agreed more units of housing was needed in the community. As a PHA, it is difficult for households to find units for the voucher program. The stakeholder was surprised by the gaps analysis presented to them in the meeting presentation showing larger gaps of available housing for singles, rather than families. They shared that the data might not show the true landscape.</p> <p>On supportive services, the participant agreed that they were needed. They shared that projects built around existing services, like libraries and senior centers, are impressive, create a sense of community and help people stay in their homes.</p>



			Another CDA participant suggested to prioritize a mission driven, nonprofit developer for HOME-ARP funds. They would like to see a developer partner that understands the population needing to be served and will reduce barriers to entry accordingly.
<b>Dane County Housing Authority (DCHA)</b>	Public Housing Authority (PHA)	Focus Group Consultation	The participant shared that they are working with 45 families with EHV's from HUD. Families have more funding in the first few years. For singles, they are on their own. This shows the gap in services for single households. For families, a big challenge has been finding units for large families (5-6 children).
<b>Public Health – Madison and Dane County (PHMDC)</b>	Public agency addressing the needs of the qualifying population	Focus Group Consultation	PHMDC, when asked about supportive services, suggested that an increase to tenant education in regards to tenant rights and navigating the 'system' was needed. An example was how to submit complaints to building inspection, public health and what the process is. On the other side, education among property owners/managers on what to expect if they are inspected by a governmental agency and how to best serve residents is also needed. The big goal from this participant is to increase relationships between tenants and owners/managers. From their work, this is an area that needs to be improved.
<b>Urban Triage</b>	Private agency addressing the needs of the qualifying population	Focus Group Consultation	This participant agreed that more units of housing was needed in the community. As for the target population, they saw a need for both housing for individuals and families. For services, they shared that housing stability services were

			important and needed. When asked for additional feedback, the participant urged for more engagement among community members that are more likely to live in the housing that is built. Affordable housing development should focus on the humanity of the people who will live in it once completed.
<b>Fair Housing Center of Greater Madison</b>	Civil Rights & Fair Housing	Focus Group Consultation	<p>The participant shared that there is a need for larger units with three-to-four bedrooms. Another need is for developers and any property managers developing housing through this HOME-ARP program is to be knowledgeable of fair housing, ideally constructing units that are accessible to all. The participant also encouraged any housing development using these funds to function as a pro-integration study. They encouraged the County to award points or place priorities for funding that allow for that integration.</p> <p>For services, the participant referenced the Joining Forces for Family (JFF) program and encouraged HOME-ARP funds to fund these case workers as they are embedded into the community.</p>
<b>Tenant Resource Center</b>	Civil Rights & Fair Housing	Focus Group Consultation	No feedback provided.
<b>City of Madison Department of Civil Rights</b>	Civil Rights & Fair Housing	Online Survey	This stakeholder was invited to the Focus Group Consultation but did not participate. In their individual response to the email survey collected on June 2, 2022, a representative indicated a strong preference for Tenant-Based Rental Assistance (TBRA) as a priority. For gaps in supportive services, the respondent

			<p>commented that there is a need for critical support or a “plan B” for tenants where homelessness is imminent. Many tenants in marginalized communities are on a month-to-month lease and the law requires a landlord to only provide 30 days’ notice prior to not renewing a tenants’ lease. In their experience, this notice is not enough time for tenants with intersectional, marginalized identities in protected classes (receive Section 8, are victims of domestic abuse, are single with children, person of color, English as not a primary language, etc.). In their experience this isn’t enough time for the County to determine whether a landlord had legitimate business reasons to not renew a tenant or if the non-renewal was unlawful. A solution is needed.</p> <p>The respondent also indicated that there is a substantial need for tenant and landlord mediation services. The current system is overburdened. This respondent disagreed that HOME-ARP funds should be used for a Hotel Conversion strategy or new affordable housing. Instead, the respondent encourages TBRA, supportive services and non-congregate shelter.</p>
<b>Movin’ Out, Inc.</b>	Private agency addressing the needs of people with disabilities	Focus Group Consultation	<p>Movin’ Out agreed that there is a need for more units, especially properties with permanent supportive housing. As a housing developer, they shared that their properties with supportive housing (30% AMI units) has interest lists hundreds of people long. They also shared that there is a tremendous need for units for large</p>

			<p>families. Their townhome units at a recently completed project were first to get leased up.</p> <p>Movin' Out shared that as a developer who integrates permanent supportive housing units within their projects, that they are consistently pushing back against forces pushing them to produce 100% supportive housing developments. In their view, an integrated housing model is more successful for the project and the tenants.</p> <p>For supportive services, Movin' Out agreed with others in the group that funds for case management were needed.</p> <p>When asked if they had additional feedback, Movin' Out shared that construction costs have created large gaps for affordable housing projects in the current environment. Construction contingencies are gone and some tax credit projects are stalled. There is a need for additional resources to get these projects finished. They also shared that climate change is a huge issue. Residents need to have safe and energy efficient places to live.</p>
<p><b>Aging and Disability Resource Center (ADRC)</b></p>	<p>Public agency addressing the needs of people with disabilities</p>	<p>Focus Group Consultation</p>	<p>The highest need identified by this participant other than long-term care is for available housing. They consider the lack of available housing as an unmet need. Regardless of the target population, they encourage new units to be ADA compliant or ensure that at least a select number of units are accessible.</p>

***The following organizations were invited to consultation session but did not participate:***

- Catholic Charities (homeless service provider, and addresses the needs of the qualifying population);
- Tellurian, Inc. (homeless service provider, and addresses the needs of the qualifying population);
- Dane County Veterans Service Office (private agency that serves the needs of veterans, and addresses the needs of the qualifying population).

## Feedback Received

***Summarized feedback received and results of upfront consultation with these entities:***

Feedback received from both the email survey and the focus group indicates a strong support for the development of new affordable housing. Supportive services also had broad support; however, many of the public and private agencies consulted expressed significant challenges locating housing units for their clients.

### ***Action Plan Public Contact Information***

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## Public Participation

In accordance with Section V.B of the Notice (page 13), Dane County provided for and encouraged citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, Dane County provided residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. Dane County followed its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, Dane County held **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

Dane County made the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, Dane County followed its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that is identified in the current citizen participation plan as required by 24 CFR 91.105 and 91.115.

## Public Participation Process

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- ***Date(s) of public notice: 1/27/2023***
- ***Public comment period: start date – 1/27/2023 end date – 2/26/2023***
- ***Date(s) of public hearing: 10/25/2022***

***Describe the public participation process:***

An email survey was sent out on May 27, 2022, to various list serves with a focus on government, service providers and individuals with lived experience which included all providers identified in Section V.A. of the Notice (page 13) within the Dane County Urban County Consortium. The survey collected 111 responses when the survey closed on June 10, 2022, mostly from direct service providers. On July 14, 2022, an invite to a focus group was sent to twenty-six public and private agencies. On August 3, 2022, the focus group met with nineteen agencies.

In addition to email surveys and the consultation process, the Dane County encouraged public participation in the development of its HOME-ARP Allocation Plan through the following:

- The draft plan was made available for review via electronic notification to various entities including residents, agencies, developers, other funding sources, and government entities through several community distribution lists and within the Dane County Urban County Consortium.
- The draft plan was posted on the Dane County website ([www.cdbg.countyofdane.com](http://www.cdbg.countyofdane.com)). Paper copies were made available for review upon request.
- Notice of public hearing was published in the Wisconsin State Journal.
- Notice of public hearing was published at the Dane County website ([www.cdbg.countyofdane.com](http://www.cdbg.countyofdane.com)).
- Notice of public hearing was published at the Housing Access & Affordability Division website (<https://www.dcdhs.com/Economic-Aid-Healthcare-Housing-and-Jobs/Housing-Access-and-Affordability>)
- During its allocation plan development, Dane County held a virtual public hearing on Tuesday, October 25, 2022 to invite the public to both attend the public hearing and to provide residents an opportunity to comment on the proposed HOME-ARP funds. During this public hearing, there were no registrants and no comments were provided.
- Dane County held a secondary public hearing on Monday, February 27, 2023. On January 27, 2023, Dane County published a Notice of Public Hearing (Notice) inviting the public to attend the public hearing scheduled for February 27, 2023 as an opportunity to comment on the draft HOME-ARP Allocation Plan and the public hearing scheduled for the Substantial Amendment to the FY 2021 Annual Action Plan. The published notice also informed the public where copies of the draft HOME-ARP Allocation Plan may be available for review. Written comments were accepted throughout the comment period and oral and written comments were accepted during the public hearing. The 30-day comment

period expired on February 26, 2023. **There were no public comments received within the public comment period.**

### Efforts to Broaden Public Participation

***Describe efforts to broaden public participation:***

In addition to the standard public participation procedures we have used in the past, Dane County employed the following strategies to broaden public participation:

- Dane County posted all Notices of Public Hearing in both English and Spanish, the two most commonly spoken languages in Dane County.
- Dane County held the public hearing in a hybrid model (in-person and virtually), to ensure all who wanted to attend were able to, without facing transportation and/or accessibility barriers.
- Dane County engaged with the local CoC, as a method to receive feedback from individuals with lived experience.
- Dane County worked with other partners like the City of Madison to expand and maximize awareness of the HOME-ARP funds and plan.

### Summary of Comments and Recommendations Received through the Public Participation Process

***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

No comments and recommendations received through the public participation.

### Summary of Comments or Recommendations Not Accepted and Explanation of Why

***Summarize any comments or recommendations not accepted and state the reasons why:***

There were no comments and recommendation to accept.

### Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), Dane County evaluated the size and demographic composition of **all four** of the qualifying populations within its boundaries and assessed the unmet needs of each of those populations. In addition, Dane County identified any gaps within its current shelter and housing inventory as well as the service delivery system. Dane County used current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

### Size and Demographic Composition of Qualifying Populations

***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

### ***Homeless as defined in 24 CFR 91.5***

HUD defines 'homeless' as:

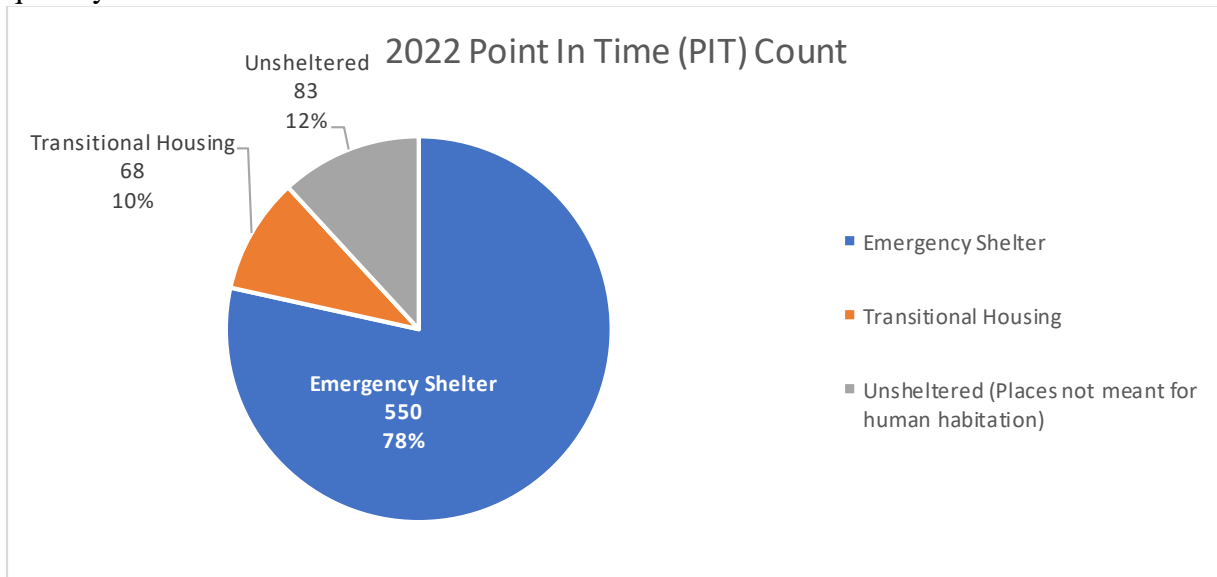
- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organization or by federal, state, or local government programs for low-income individuals); or
  - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- 2) An individual or family who will imminently lose their primary nighttime residence, provided that:
  - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
  - ii. No subsequent residence has been identified; and
  - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- 3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
  - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood

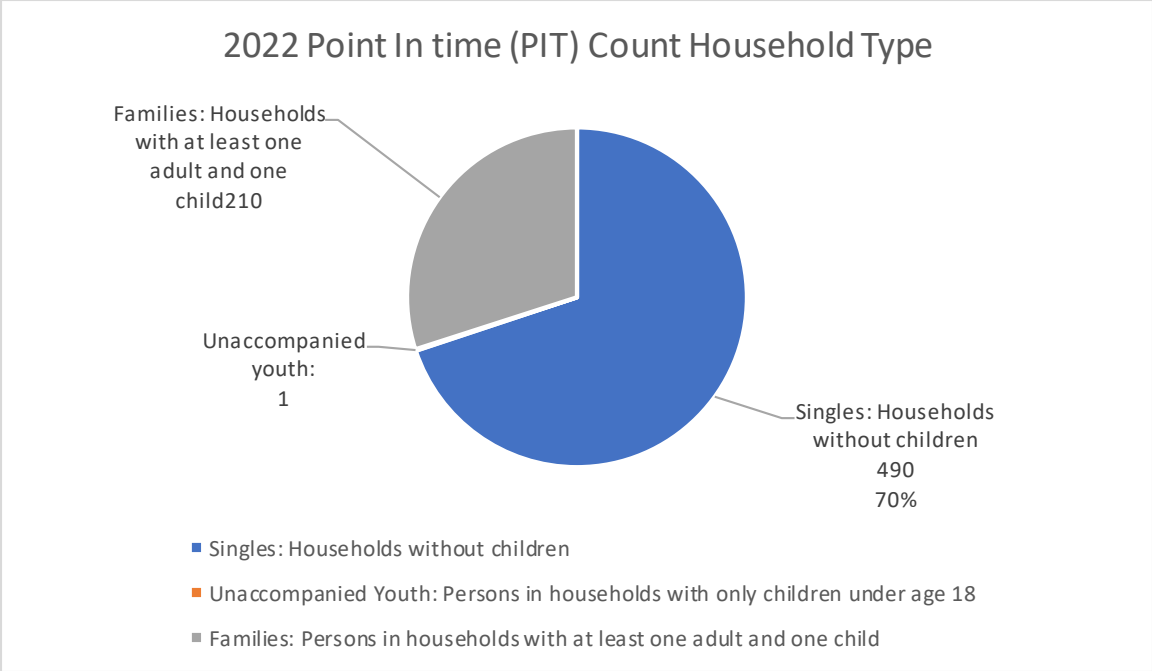


abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history or incarceration or detention for criminal activity, and a history of unstable employment; or

- 4) Any individual or family who:
  - i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - ii. Has no other residence; and
  - iii. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

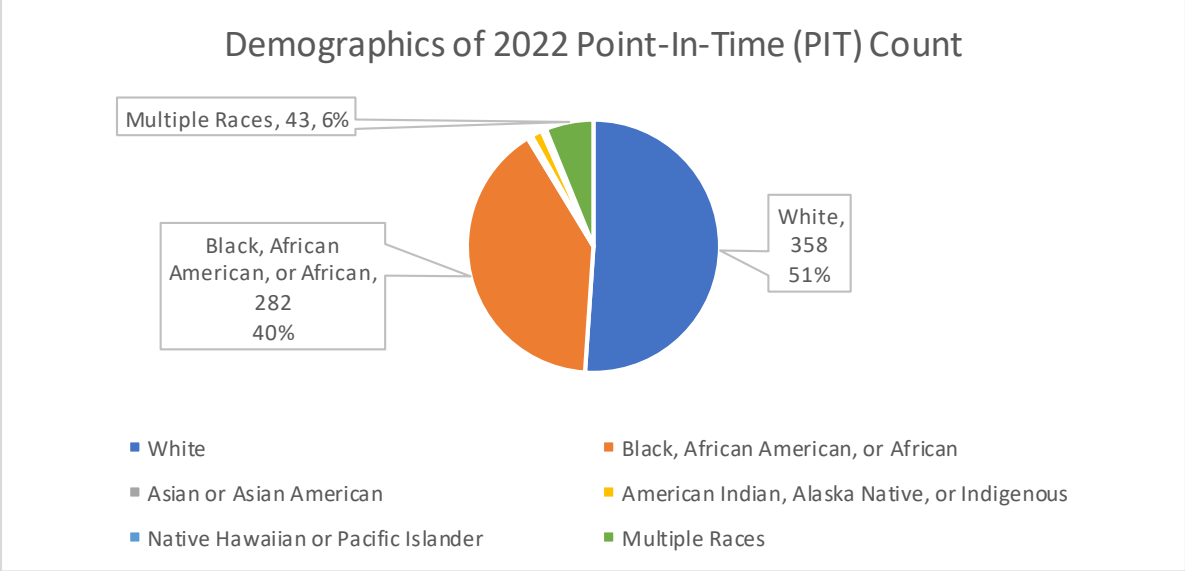
Using the January 2022 Point in Time Count (PIT), 701 people were identified as experiencing homelessness. Of the 701 people identified, 409 persons were in single or couple households. A total of 210 persons made up 64 families experiencing homelessness. The PIT count only includes people in shelters, transitional housing, and unsheltered locations. People who are doubled up, self-paying for motel/hotel nights and those in institutions are not counted and are difficult to quantify.





A chronically homeless individual is defined as a person with a disability who has been continuously homeless for one year or more or has experienced at least four episodes of homelessness in the last three years where the combined length of time homeless is those occasions is at least 12 months. During the January 2022 PIT count, 169 persons were considered chronically homeless.

People of color are considerably overrepresented among the homeless population compared to the overall Dane County population. While accounting for 5.5% of the Dane County population, Blacks, African Americans, or Africans accounted for 40% of all people identified as experiencing homelessness.



According to FY2021 Annual Homeless Data, there were 2,135 people who were served in shelters and transitional housing programs. Of this population, 56% of adults who used emergency shelter or transitional housing in had at least one disabling condition.

The Wisconsin Department of Instruction tracks occurrences of reported homelessness among school aged children in the State. During the 2020-2021 school year, the Madison Metropolitan School District (MMSD), identified 716 students who experienced homelessness at any time during the school year. The vast majority of homeless students, 680 minors, were in the physical custody of a parent or legal guardian. 36 students were unaccompanied. The majority of students experiencing homelessness were living in settings that are not tracked by the point-in-time (PIT) count. The district reported 443 students whose primary nighttime residence at some point throughout the school year was in a Doubled-Up environment. Doubled-Up as defined in McKinney-Vento refers to shared living arrangements due in-part to economic hardship or housing loss. Moreover, 146 students who experienced homelessness during the 2020-2021 school year used hotel and motels as their primary nighttime residence, 100 students stayed in shelters or transitional housing programs and 27 students were unsheltered.

In the Sun Prairie Area School district, a total of 173 students were identified as experiencing homelessness at any time during the school year. The vast majority of homeless students, 153 minors, were in the physical custody of a parent or legal guardian. 20 students were unaccompanied. Similarly, like the MMSD, the majority of students experiencing homelessness were living in settings that are not tracked by the point-in-time (PIT) count. The district reported 443 students whose primary nighttime residence at some point throughout the school year was in a Doubled-Up environment.

<b>Table 1: Primary Nighttime Residence for Homeless (2020-21)</b>				
<b>Total Number of Students Identified by School District</b>				
<b>Primary Nighttime Residence</b>	<b>Madison Metropolitan School District</b>	<b>Sun Prairie Area</b>	<b>Middleton-Cross Plains Area</b>	<b>Verona Area</b>
Doubled-Up	443	114	54	54
Hotel/Motel	146	29	7	5
Shelter and Transitional Housing	100	29	0	9
Unsheltered	27	1	0	1
Source: Wisconsin Department of Instruction. WISEdash 2020-2021.				

***At Risk of Homelessness as defined in 24 CFR 91.5***

HUD defines ‘at risk of homelessness’ as:

- 1) An individual or family who:
  - i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
  - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
  - iii. Meets one of the following conditions:
    - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - B. Is living in the home of another because of economic hardship;
    - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
    - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
    - F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
    - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan;
- 2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- 3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

<b>Table 2</b>	
<b><i>Income Distribution Overview</i></b>	<b><i>Renter</i></b>
Household Income <= 30% HAMFI	24,755
<b><i>Housing Problems Overview</i></b>	<b><i>Renter</i></b>
Household has at least 1 of 4 Housing Problems	42,300
<b><i>Severe Housing Problems Overview</i></b>	<b><i>Renter</i></b>
Household has at least 1 of 4 Severe Housing Problems	23,645
<b><i>Housing Cost Burden Overview</i></b>	<b><i>Renter</i></b>
Cost Burden <=30%	51,580
<b><i>Income by Housing Problems &lt;=30%HAMFI</i></b>	<b><i>Renter</i></b>
Household has at least 1 of 4 Housing Problems	21,395
<b><i>Income by Cost Burden</i></b>	<b><i>Renter</i></b>
Household Income <= 30% HAMFI	21,295
Source: CHAS 2015 - 2019	

Eviction filings can also help shape the qualifying population who are at the imminent risk of losing their housing. The Wisconsin Department of Administration Eviction Data Project tracks eviction filings and judgements across all counties in Wisconsin. The most current data available shows that from January to August of 2022, Dane County saw 968 eviction filings. 3.2% of these filings resulted in a judgement. Dane County works with the Tenant Resource Center, a housing justice organization that serves low-income households at-risk of homelessness, provide eviction prevention and mediation services to households facing eviction.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

**Domestic violence**, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;

- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

**Dating violence** which is defined in 24 CFR 5.2003 means violence committed by a person:

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

**Sexual assault** which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

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

**Human Trafficking** includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- 1) *Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) *Labor trafficking* means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Quantifying victims who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking is difficult and underreported. Data sources that can help shape the size of this population comes from our homeless service providers, advocacy organizations and local law enforcement.

- 2021 annual data of people experiencing homelessness who were tracked through the system found that out of 2,135 people, 9% (191 people) identified themselves as a domestic violence survivor and currently fleeing. Moreover, 18% (382 people) identified themselves as a domestic violence survivor but were not currently fleeing or their fleeing status was unknown.
- A total of 701 people were identified as experiencing homelessness during the 2022 point-in-time count. During the census, 48 out of 570 adults responded that they were experiencing homelessness because they are currently fleeing domestic violence, dating

violence, sexual assault or stalking. This question was only asked to people who were over the age of 18.

<b>Table 3: Adult Survivors of Domestic Violence</b>					
Additional Homeless Populations	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Adult Survivors of Domestic Violence	36	11	0	1	48
Source: 2022 Point-in-Time (PIT) Count – 1/26/2022					

Domestic Abuse Intervention Services (DAIS) who operates the only domestic violence shelter in Dane County reported through its 2020 annual report that it received 8,399 phone calls through its help-line, served 223 individuals through case management, housed 238 adults and children through their shelter program and served 742 people through legal advocacy.

UNIDOS is a non-profit serving the Latinx and immigrant community affected by domestic violence and sexual assault in Dane County. UNIDOS operates the only bilingual 24/7 helpline in Dane County. In 2022, UNIDOS received approximately 1500 calls through the helpline and assisted 250 clients with various services, including case management, legal advocacy, and individual counseling. Ninety-five percent (95%) of clients served self-identified as Hispanic/Latino, 72% as immigrant/refugee/asylum seekers, and 68% reported a household income of 0-30% of the annual median income.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice***

**Other Populations** where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- 1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
- 2) **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:

- a. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
- b. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, **AND** meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:
  - i. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - ii. Is living in the home of another because of economic hardship;
  - iii. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - iv. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
  - v. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
  - vi. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - vii. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

<b>Table 4: Dane County Emergency Rental Assistance (ERA)</b>	
Income Range	Number of Households
Under 30% AMI	6,339
Between 30% and 50% AMI	1,932
Between 50% and 80% AMI	538
Total	8,810
Source: Dane County ERA Data Set September 1, 2021 to January 27, 2023	

**Households at greatest risk of housing instability**

Households who are at greatest risk of housing instability are defined as households with incomes less than or equal to 30% of AMI and paying more than 50% of monthly household income toward housing costs. Table 5 shows that 17,320 households are identified as having severe cost burdens by paying more than 50% of monthly household income towards housing costs.

As the HUD Area Median Family Income increases the number of households substantially decreases in those that are identified as having a cost burden more than 50%. The practitioners in Dane County shared that households with incomes less than or equal to 30% of AMI and pay more than 50% of monthly household income towards housing costs have predominantly been at the



greatest risk of housing instability. With limited amount of affordable housing units for the households earning at or below 30% of AMI has led to the overpayment of housing costs despite the limited income. Table 8 shows that there is a gap analysis of 100 units that would need to serve the households at or below 30% of AMI. This significant gap has led Dane County to set up preferences with first serving households that are experiencing homelessness being identified through our local Continuum of Care (CoC), then serving other populations within the referral list such as those at imminent risk of homelessness, those fleeing domestic violence, dating violence, stalking, sexual abuse, or human trafficking, or those whose homelessness could be prevented with service provision.

<b>Table 5: Households (HH) with Severe Cost Burdens (paying more than 50% of income towards housing) – Renters Only</b>			
	Cost burden > 30%	Cost burden > 50%	Total
HH Income less-than or equal to 30% HAMFI	21,295	17,320	24,755
HH Income >30% to less than or equal to 50% HAMFI	13,475	2,540	18,535
HH Income >50% to less-than or equal to 80% HAMFI	4,640	320	20,455

**Data Sources:** 1. Comprehensive Housing Affordability Strategy (CHAS) (2015-2019)

**Veterans and Families that include a Veteran Family Member** that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

According to 2021 American Community Survey estimates, there were 21,442 veterans in Dane County. Approximately 4,901 veterans had some form of a service-connected disability and 698 veterans had incomes below the poverty level. The median income in the past 12 months (in 2021 inflation-adjusted dollars) a veteran’s household is estimated to earn on average \$57,310 which would be within the low-to-moderate income threshold. As of February 27, 2023, a household of one person in Dane County earning at or below \$62,600 would be identified as being within the low-to-moderate income threshold. The median income for a veteran household is within the 80% limit for the Madison, WI HUD Metro Area.

Approximately 494 veterans are unemployed in Dane County. In the 2022 Point-in-Time (PIT) count, approximately 42 persons were in veteran households that identified as being homeless. The Point-in Time count does not capture all household types as there may be veterans that are doubled-up homeless and would not be captured in the PIT count. The 42 persons would account for 0.20% of the veteran population in Dane County being recorded as homeless. Veterans that are experiencing homelessness and are at or below 30% AMI would be able to receive preference based on the household’s income level.

## Unmet Housing and Service Needs of Qualifying Populations

### *Describe the unmet housing and service needs of qualifying populations:*

Dane County has grown in a rapid pace over the last 15 years. Much of the growth has occurred around renter households and those earning very high incomes. The effect of this trend is that there is high tension and competition within the housing market, and supply has not kept up with demand. According to the U.S. Census Bureau in Dane County there's a total of 216,022 housing units with only a vacancy of 12,272. The vacancy percentage of all housing units is 5.68%. While there is a robust construction of new housing, the vacancy rate in Dane County is still far below healthy levels.

The ownership market applies further pressure in Dane County's rental market. New home construction is not only unaffordable to the median renter household, but to the median household overall. In 2022, a total of 1,241 single family permits were acquired in Dane County. Recent interest rate environments, high construction and land costs, and a lack of supply have increased barriers to access. This causes households who would enter the ownership market to continue to rent, applying further market pressure on renter households who can't afford to make the leap into owning.

While Dane County needs more housing options available to households of all incomes, Dane County has made it a high priority to specifically increase the number of rental units for households at the lowest end of the economic spectrum – at or below 30% AMI. Table 6 listed below will display the 'Housing Inventory and Gaps Analysis for Homeless Populations' highlighting the variances within the gaps analysis and Table 7 will display the 'Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) Inventory' stressing the needs in Dane County. According to Table 8 there's a total gap of 675 affordable units that are needed to support households at or below 50% AMI, of which, there's a total of 100 units as the gap showing the need for households at or below 30% AMI. High construction and material costs, increases in the cost of financing and other factors have made these units impossible to build without a deep subsidy. Moreover, the Dane County's Affordable Housing Development Fund, which provides soft debt to Low-Income Housing Tax Credit projects, requires that projects include integrated supportive housing for households at or below 30% of AMI.

Integrated supportive housing is ideal for households that are exiting RRH programs or who are homeless but only require light services to maintain their housing. As such, the HOME-ARP Allocation Plan budget accounts for the cost of supportive services and non-profit operating costs to provide the services to the tenants of the affordable housing units. According to the Urban Institute, the events of 2020 dramatically impacted nonprofits that led to a severe decrease in primary revenue streams and volunteer human resources. Given Dane County's robust number of nonprofits in our community (both small and large) and the feedback received by our community practitioners, it was quite evident the need to support the nonprofit delivering the supportive service by also providing \$15,000 in operating costs. This amount will help offset additional

expenses that the nonprofit would incur and in return would allow the nonprofit to leverage the funding to secure additional funding to support the activity.

A review of the current inventory of emergency shelter, transitional housing, rapid rehousing and other permanent housing programs to data from the annual 2021 Point-in-Time count shows that gaps persist among both households with and without children. However, the largest gaps were among adult only households. Table 6 below shows that there is a gap of 1,180 beds or 1,350 units to serve homeless adults compared to the gap of 135 beds or 26 units for homeless family households with children. Tables 6-8 exemplify why Dane County is in an emerging need to develop more affordable housing units in Dane County.

Within the development of the affordable housing, during the consultation phase, it was evident that the need to serve households that are homeless, particularly those at or below 30% AMI, have the greatest need and limited amount of resources available to assist them. One particular nonprofit said during the focus group that they have funding available to help offset the costs of rent but are unable to find affordable units in Dane County to serve this population. Other nonprofits echoed the same sentiment that the need is so large in Dane County that many families that are homeless often have to wait a long period of time before they are able to find a unit that they are able to afford. As previously mentioned above, the gap of 675 affordable units has placed a significant strain with our current housing market which has led to a significant amount of families being overburden with housing costs. With all the quantitative and qualitative data provided, Dane County has decided to give a preference with first serving households that are experiencing homelessness being identified through our local Continuum of Care (CoC), then serving other populations within the referral list such as those at imminent risk of homelessness, those fleeing domestic violence, dating violence, stalking, sexual abuse, or human trafficking, or those whose homelessness could be prevented with service provision.

### Introduction/Base Demographics

**Table 6: Housing Inventory and Gaps Analysis for Homeless Populations**

	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	354	106	481	465	0								
Transitional Housing	66	17	64	64	24								
Permanent Supportive Housing	401	122	422	422	181								
Rapid Rehousing (RHH)	357	104	171	171	7								
Other Permanent Housing	454	122	399	399	6								

Sheltered Homeless		367		1,350		63 HH	399 HH	38 HH	47				
Unsheltered Homeless						1 HH	81 HH	1 HH	1				
<b>Current Gap</b>						64 HH	480 HH	39 HH	48	135	26	1,180	1,350

**Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Housing Intervention	Existing Stock on Point-in-Time	Number of Units Available Annually through Turnover	Annual Needs Based on Assumptions	Annualized Over/(Under) Units
Permanent Supportive Housing (PHS) - Families	131 units	13 units	39 units	(26 units)
Permanent Supportive Housing (PHS) - Individuals	450 beds	45 beds	180 beds	(135 beds)
Rapid Rehousing (RRH) & Other Permanent Housing Programs – Families	129 units	182 units	170 units	12 units
Rapid Rehousing (RRH) & Other Permanent Housing Programs – Individuals	364 beds	151 beds	1,196 beds	(1,045 beds)

	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	93,190		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	21,295		
Rental Units Affordable to HH at 50% AMI (Other Populations)	13,475		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		21,395	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		14,050	
<b>Current Gaps</b>			(675)

**Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS) (2015-2019)

### Gaps within the Current Shelter, Housing Inventory, and Service Delivery System

**Identify any gaps within the current shelter and housing inventory as well as the service delivery system:**

All emergency shelters are physically located in the City of Madison and serves the Dane County Population. See data listed below relevant to the shelter and housing inventory as well as the service delivery system.

*Service Delivery System*

The homeless services system is categorized by tenant support, prevention, crisis response and permanent housing. Dane County’s investment in tenant supports include housing counseling, fair housing services and housing stabilization. Housing counseling includes funds for counseling, outreach and education of fair housing. Housing stabilization services provide legal services to qualifying households who are at risk of losing their housing. Moreover, the investment in prevention strategies include rental assistance to avoid evictions, legal aid to support households who are within the eviction court system, and division programs that aim to quickly house families and women who are experiencing homelessness.

Almost half of Dane County’s investment in the homeless services system is in crisis response. This includes funding the Dane Continuum of Care (CoC) Coordinated Entry program as well as the Homeless Management Information System (HMIS). Other activities under crisis response include street outreach, housing navigation, transportation, employment, healthcare, transitional housing and shelter.

*Shelter Inventory*

The emergency shelter inventory, which also includes seasonal shelter options and motel vouchers, is 843 beds and 595 units. Facilities include the Beacon Day Center, a day-time shelter available to individuals and households experiencing homelessness where basic needs and wellness can be addressed and can connect individuals and households to support services. The City of Madison also has a dedicated family shelter and a family and women’s shelter. One gap in the system has been with the men’s shelter. To improve shelter facilities available to homeless men, the City of Madison has invested significantly in the development of a temporary men’s shelter and a much larger project to build the first purpose built men’s shelter in the City of Madison. The distribution of emergency shelter and transitional housing inventory are illustrated in Table 9 below.

<b>Table 9: Shelter Inventory</b>								
<b>Category</b>	<b>Total Year-Round Beds</b>		<b>Total Year-Round Units</b>	<b>Only Children (under 18) and Veterans</b>		<b>Seasonal and Overflow</b>		<b>Total</b>
	HH with Children	HH without Children		HH with Children	Only Children Beds	Veteran Specific Beds	Seasonal Beds	
Emergency Shelter, Seasonal Shelter, Motel Vouchers (HMIS & non-HMIS)	354	481	106	8	0	0	33	843 B / 595 U
Transitional Housing and Transitional	66	64	17	0	24	0	0	154 B / 105 U

Living (HMIS & non-HMIS)								
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Moreover, in 2021 the City also opened a temporary sheltered campground for people experiencing homelessness. The users of the facility are housed in 30 small climate controlled modular housing structures with electricity and heat. The campground also includes sheltered bathroom facilities and a small building that houses meeting room space and on-site staff. The temporary sheltered campground was developed in response to the COVID-19 pandemic and for persons who are experiencing homelessness and not using the shelter system. The chronic shortage of affordable housing in Madison continues to make it difficult for many to find housing. The sheltered campground is intended to provide safe, short-term places for people to stay until they are connected to housing. The sheltered campground helps fill a gap in services available to individuals and households who are not served by Madison’s shelter system. For example, shelters are not able to accommodate couples without children and they do not work for persons who have difficulty being around large groups of people, many of whom have extensive trauma histories and/or may be in crisis.

[Priority Needs for Qualifying Populations](#)

***Identify priority needs for qualifying populations:***

As concluded from consultation with service providers who work with the qualifying populations as well as the gaps and needs assessment, the priority needs identified are the development of permanent supportive housing available to households at or below 30% AMI and supportive services available to help households maintain their housing. Feedback received from the consultation process indicates strong support for the development of new permanent supportive affordable housing and support services. Service providers who serve the qualifying populations prioritized getting new units of housing built to alleviate demand. Table 8 highlights the immediate need of 675 affordable units to serve the households at or below 50% AMI, of which 100 units are needed to serve households at or below 30% AMI.

One particular nonprofit said during the focus group that they have funding available to help offset the costs of rent but are unable to find affordable units in Dane County to serve this population. Other nonprofits echoed the same sentiment that the need is so large in Dane County that many families that are homeless often have to wait a long period of time before they are able to find a unit that they are able to afford. As previously mentioned above, the gap of 675 affordable units has placed a significant strain with our current housing market which has led to a significant amount of families being overburden with housing costs. With all the quantitative and qualitative data provided, Dane County has decided to give a preference with first serving households that are experiencing homelessness being identified through our local Continuum of Care (CoC), then serving other populations within the referral list such as those at imminent risk of homelessness, those fleeing domestic violence, dating violence, stalking, sexual abuse, or human trafficking, or those whose homelessness could be prevented with service provision.

## Determination of the Level of Need and Gaps in the Shelter and Housing Inventory and Service Delivery Systems Based on the Data Presented in the Plan

### ***Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:***

The needs and gaps presented above were identified after reviewing all available resources to assist households experiencing homelessness and households at-risk of homelessness. These include:

- Point-in-Time (PIT) Count
- American Community Survey
- Homeless Management Information System (HMIS) data
- Comprehensive Housing Affordability Strategy (CHAS) data
- WISEdash Public Portal – Wisconsin Department of Public Instruction.

Data specific to every qualifying population was not always readily available. However, the County analyzed all available data and combined it with qualitative information gathered through the consultation phase with housing providers and service agencies that work with the qualifying populations. This multi-layered approach gives Dane County confidence that our proposed activities represent the best use of HOME-ARP funds to meet existing needs and gaps.

## HOME-ARP Activities

### ***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

Dane County will distribute HOME-ARP funds through a Request for Proposal (RFP) process. Dane County will seek proposals from interested entities with the capacity and interest to implement projects/activities supporting the HOME-ARP eligible activities serving the Qualifying Populations (QP's). The County will seek proposals that will serve HOME-ARP eligible populations and address the following priority activities:

- ***Affordable Rental Housing for qualifying populations/households, and/or***
- ***Supportive Services in conjunction with a HOME-ARP affordable housing project (provided the individuals are not already receiving these services through another program).***

Notice of the RFP will be shared with all entities engaged throughout the consultation process, posted to the County website ([www.cdbg.countyofdane.com](http://www.cdbg.countyofdane.com)) and in the Dane County's Purchasing Division website ([www.danepurchasing.com](http://www.danepurchasing.com)) and via a public press release. Interested parties will be provided an opportunity to ask written questions and seek clarification about the HOME-ARP program, the RFP, or the application process.

Dane County will allocate its HOME-ARP funds to new affordable housing development projects to increase the supply of rental housing for the qualifying populations. The County aims to allocate \$1,617,059.40 of its HOME-ARP allocation to develop new units of permanent supportive housing. In addition, the County recognizes that supportive services are necessary to support the qualifying population as they transition out of homelessness. The need for supportive service dollars, especially around case management, was a main theme in the County's consultation with

service providers and other agencies that work with the qualifying populations in accordance with Notice CPD-21-10. Another main theme was how limited operating dollars can be for nonprofits and the ability to fund \$15,000 of operating dollars will help offset expenses.

***Describe whether the PJ will administer eligible activities directly:***

Dane County intends to administer its HOME-ARP funding directly, and dependent on the outcome of procurement processes, in partnership with the City of Madison to increase the development of affordable rental housing.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 285,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 1,617,059.40		
Non-Profit Operating	\$ 15,000.00	0.67 %	5%
Non-Profit Capacity Building	\$ 0.00	0.00 %	5%
Administration and Planning	\$ 338,304.60	15.00 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 2,255,364.00</b>		

HOME-ARP funding has not yet been allocated to a specific project. In order to fully utilize HOME-ARP funding, Dane County may reduce the amount of funding allocated to administrative and planning activities if it is determined that this funding is not needed to fully support the administration of the HOME-ARP Program. In the event funding for administrative and planning activities is reduced, it will be redirected to supportive services or development of affordable rental housing.

Dane County has designated \$15,000 to be used by the nonprofit that will be providing the supportive services. Recognizing the limited resources in securing operation dollars, the \$15,000 will help offset expenses that the nonprofit incurs as it operates the \$285,000 in supportive services. This specific designation is very small as it only accounts for 0.67% of the total grant which is well below the statutory limit of 5%.

Method for Distributing HOME-ARP in Accordance with Priority needs

***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

Through the needs assessment and the gap analysis, the community stakeholders identified that the development of affordable rental housing units was the top of the priority. With examples shared, it was evident that families who are homeless, specifically those at or below 30% AMI,



are at the greatest need to be served. There is other sources of funds available to pay for the cost of their rent but there are no sufficient affordable units in Dane County to meet the needs of this population. Table 8 listed above highlighted a gap of 100 affordable units to meet the demand of households at or below 30% AMI. With all the quantitative and qualitative data provided, Dane County has decided to give a preference with first serving households that are experiencing homelessness being identified through our local Continuum of Care (CoC), then serving other populations within the referral list such as those at imminent risk of homelessness, those fleeing domestic violence, dating violence, stalking, sexual abuse, or human trafficking, or those whose homelessness could be prevented with service provision.

Dane County intends to allocate the HOME-ARP funds to new affordable housing development projects to increase the supply of rental housing for the qualifying populations. Dane County will distribute \$1,617,059.40 of its HOME-ARP allocation to develop new units of permanent supportive housing, \$285,000.00 to a nonprofit that will provide supportive services, and \$15,000.00 to cover operating expenses through the administration of the supportive services. Dane County intends to fund a developer and a nonprofit organization that are able to meet the needs of the qualifying populations and most importantly those that were identified as preferences. Both the developer and the nonprofit organization selected will show a strong track record of developing and providing similar services. It is extremely important that the nonprofit understands how to work with the qualifying populations and their specific needs that may arise throughout.

The \$1,617,059.40 HOME-ARP funds allocated to the development of affordable rental housing will be used for capital costs and funds allocated to supportive services will be offered to the project to support the qualifying population served through the activity. The County will not be able to identify project-based rental subsidy to reduce rents to affordable levels for the qualifying population. Due to the complex needs of the qualifying population, the County will allow its HOME-ARP funds to fully capitalize the cost of each HOME-ARP unit created to reduce debt and operating costs.

In addition to the funds mentioned above, Dane County intends to utilize \$338,304.60 in the administration and planning of the HOME-ARP activity, of which is within the 15% statutory limit allowed. These funds will allow Dane County to properly account for staff time spent in the administration and planning of the HOME-ARP activity.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

In Dane County there is a deficit in permanent housing programs, particularly for non-family households as illustrated in Table 7, provides for the County's rationale to concentrate its HOME-ARP allocation on the development of new housing units with supportive services to serve the qualifying populations.

## HOME-ARP Production Housing Goals

### Housing Production and Supportive Service Goals

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

Dane County anticipates that its HOME-ARP funds will produce 4-5 units of housing. Due to the increasing costs of development, Dane County took a conservative approach to estimate that the per-unit cost of development landing between \$250,000 and \$300,000 per unit.

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:***

Dane County will fund one housing development with its HOME-ARP allocation. Per HOME-ARP requirements, the per-unit subsidy cap has been removed to provide flexibility in financing units targeting the qualifying populations. Dane County anticipates covering the majority of the cost to construct the units identified above to reduce the need to carry debt on HOME-ARP units. This strategy allows HOME-ARP units to carry much lower rents without a needed subsidy. The balance of Dane County's HOME-ARP allocation will provide supportive services to these units to help stabilize the project over its first several years.

## Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a Dane County-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which Dane County determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for

housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

In accordance with Section V.C.4 of the Notice (page 15), Dane County intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- Dane County will comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

Dane County establishes a preference for households experiencing homelessness as defined in Section 3205 of the American Rescue Plan Act of 2021. Dane County may use its HOME-ARP funds to assist in funding the construction of units to be permanent supportive housing and preference households currently literally homeless. If there are no eligible households referred from the local Continuum of Care the units may move to a referral wait list of households at imminent risk of homelessness, those fleeing domestic violence, dating violence, stalking, sexual abuse, or human trafficking, or those whose homelessness could be prevented with service provision.

Dane County will ensure that selected projects comply with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to requirements listed in 24 CFR 5.105(a). In accordance with federal and Wisconsin Fair Housing laws, no housing or services will be denied to persons based on race, color, family status, disability, sex, national origin, religion, marital status, ancestry, source of income, sexual orientation, age and the status as a victim of domestic abuse, sexual assault or stalking.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ’s needs assessment and gap analysis:***

As detailed in the needs assessment, Dane County has significant shortages of housing for households in each of the HOME-ARP qualifying population or subpopulation of the qualifying population. The shortage of housing units is most apparent for individuals and families experiencing homelessness, particularly those who are chronically homeless. Dane County prioritizes strategies to create safe, stable, affordable homes. The HOME-ARP funds will likely contribute to one development, to be solicited by an RFP process. There will be a preference for households who are homeless, prioritized by their VI-SPDAT score. While there will be a preference for people experiencing homelessness, who may themselves fall into other qualifying

population categories, HOME-ARP units would not exclude any qualifying population or subpopulation of the qualifying population from a waitlist.

### Referral Methods

Dane County will require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

Referral methods that the PJ intends to use for HOME-ARP rental housing will include coordinated entry as Dane County is implementing a preference for households experiencing homelessness. Qualifying populations that are not served through coordinated entry will be served through other referral methods including a waitlist that is developed through coordination with service providers who serve the qualifying population. Units will be held open for a period of 30 days when a vacancy arises for referrals from coordinated entry. If a referral is unsuccessful, applicants on the waiting list will be selected in chronological order.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

Not all qualifying populations eligible for a HOME-ARP project are included in the coordinated entry (CE) process. In an effort to provide access to all qualifying populations, a project or activity waitlist will be utilized by the HOME-ARP rental project as they will be required to work with agencies that serve the qualifying populations that are not served by CE.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Dane County will implement a preference for households experiencing homelessness. Dane County plans to use the CE process to refer potential tenants into HOME-ARP funded units. If the CE process is not successful in filling a HOME-ARP unit, the waitlist will be used in a chronological order.

### Limitations in a HOME-ARP rental housing or NCS project

Dane County does not intend to limit eligibility for HOME-ARP rental housing project to a particular qualifying population or specific subpopulation.

## HOME-ARP Refinancing Guidelines

Dane County will not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

## Administration of HOME-ARP Activities

As the Participating Jurisdiction, Dane County intends to administer the HOME-ARP and activities on behalf of the Dane County Urban County Consortium. As it relates to non-administrative activities under the HOME-ARP, Dane County intends to enter into project-specific agreements with entities engaging in the eligible activities with qualifying populations.